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**UNITED STATES DISTRICT COURT****NORTHERN DISTRICT OF CALIFORNIA**AIRWAIR INTERNATIONAL LTD., a  
company of the United Kingdom,

Plaintiff,

vs.

ZOETOP BUSINESS CO., LIMITED d/b/a  
SHEIN, a Hong Kong corporation,

Defendant.

Case No. 3:24-cv-08437

**COMPLAINT FOR**

- (1) **BREACH OF CONTRACT**
- (2) **BREACH OF IMPLIED COVENANT OF GOOD FAITH AND FAIR DEALING**
- (3) **FEDERAL TRADEMARK INFRINGEMENT**
- (4) **FEDERAL FALSE DESIGNATION OF ORIGIN**
- (5) **FEDERAL TRADEMARK DILUTION**
- (6) **CALIFORNIA STATUTORY UNFAIR COMPETITION**
- (7) **COMMON LAW UNFAIR COMPETITION**
- (8) **CALIFORNIA STATUTORY TRADEMARK DILUTION**

**DEMAND FOR JURY TRIAL**

1           1.       Plaintiff AIRWAIR INTERNATIONAL LTD. (“**AirWair**”) designs,  
2 manufactures, markets, and sells the well-known Dr. Martens®-brand footwear. Defendant  
3 ZOETOP BUSINESS CO., LIMITED (referred to throughout this Complaint by its trade  
4 name, “**SHEIN**”) manufactures, markets, and sells knock-offs of AirWair’s products  
5 through its website at www.shein.com.

6           2.       In 2020, AirWair sued SHEIN in this district, ultimately claiming that 45  
7 separate footwear products infringed AirWair’s trade dress. *See Airwair Int’l Ltd. v.*  
8 *Zoetop Bus. Co.*, Case No. 3:20-cv-07696 (N.D. Cal.) (the “**Prior Lawsuit**”). The parties  
9 resolved the Prior Lawsuit near the close of the discovery period through a confidential  
10 settlement agreement having an effective date of January 19, 2022 (the “**Settlement**  
11 **Agreement**”).

12           3.       Since entering into the Settlement Agreement, SHEIN has shown itself to be  
13 an unrepentant infringer. In 2022 and 2023, AirWair sent multiple Breach Notices to  
14 SHEIN pursuant to the Settlement Agreement.

15           4.       On October 25, 2024, AirWair sent SHEIN its fifth Breach Notice—  
16 advising SHEIN this time of 41 individual products that were being marketed, offered,  
17 and sold at www.shein.com in violation of the Settlement Agreement. The Settlement  
18 Agreement provides a mechanism for SHEIN, at its option, to cure breaches of the  
19 agreement by taking specific actions within specified periods of time. Although the parties  
20 conferred and sought to resolve the dispute as to the 41 products identified in the October  
21 25 Breach Notice, SHEIN ultimately chose not to or otherwise failed to timely cure the  
22 breaches as to each of the 41 products.

23           5.       Since sending the October 25 Breach Notice, AirWair has identified 11  
24 more infringing products offered at www.shein.com. AirWair therefore sent a sixth  
25 Breach Notice to SHEIN on November 25, 2024, asserting that each of those 11 products  
26 is a breach of SHEIN’s obligations under the Settlement Agreement. To the extent SHEIN  
27 does not exercise its option to fully cure the breaches as to those 11 products, AirWair’s  
28

1 intent is for those products to be among those covered by the claims set forth in this  
2 Complaint.

3 6. SHEIN's near-constant infringement of AirWair's rights since entering into  
4 a Settlement Agreement to resolve the Prior Lawsuit suggests that SHEIN never had any  
5 intention of complying with the prohibitions set forth in the Settlement Agreement.  
6 Instead, SHEIN has played a game of "catch me if you can," effectively outsourcing its  
7 intellectual property compliance obligations to AirWair. AirWair must police SHEIN's  
8 massive and constantly changing online marketplace for infringements and alert SHEIN  
9 of a breach in every instance. After first gambling that some products will be listed and  
10 sold through before AirWair catches them (as undoubtedly is the case), SHEIN can then  
11 choose to take advantage of the cure provisions in the Settlement Agreement if it gets  
12 caught or take the gamble that AirWair will not file another lawsuit over a few products.  
13 The game is up. The volume, frequency, and severity of SHEIN's infringements and  
14 breaches of the Settlement Agreement have left AirWair no choice but to come back to  
15 this Court to enforce its rights and put an end to SHEIN's rampant sale of knock-off  
16 Dr. Marten boots, shoes, and sandals.

### 17 **PARTIES**

18 7. AirWair International Ltd. is a company of the United Kingdom, located  
19 and doing business at Cobbs Lane, Wollaston, Northamptonshire, United Kingdom, NN29  
20 7SW.

21 8. On information and belief, Defendant ZOETOP BUSINESS CO., LIMITED  
22 is a Hong Kong corporation located and doing business at Rm 112 19/F TAIKOO  
23 SHING, 14 Taikoo Wan Rd., Quarry Bay, Hong Kong SAR. Using the trade names  
24 ROMWE and SHEIN, it conducts substantial e-commerce business and markets,  
25 distributes, and sells clothing and footwear products in the United States and within this  
26 District through the websites [www.shein.com](http://www.shein.com) and <https://romwe.com/>.

**JURISDICTION, VENUE, AND DIVISIONAL ASSIGNMENT**

9. This Court has subject matter jurisdiction over this action under 15 U.S.C. § 1121 and 28 U.S.C. § 1338(a) in that claims in this case arise under the trademark laws of the United States, 15 U.S.C. §§ 1051 *et seq.*

10. This Court has pendant jurisdiction over state-law claims under 28 U.S.C. § 1338(b) in that those claims are joined with a substantial and related claim under the trademark laws of the United States.

11. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because SHEIN conducts business within this District and has engaged in, and continues to engage in, acts of advertising, offering, and selling retail goods and products to consumers located within this District.

12. Divisional assignment is proper in the San Francisco Division because the Prior Lawsuit between AirWair and SHEIN was litigated before Judge Ilston in this Division and was resolved through the Settlement Agreement, which provides that future disputes related to the Settlement Agreement may be heard by Judge Illston.

13. SHEIN has also directed its activities, including the sale of infringing footwear, specifically towards the State of California. SHEIN's e-commerce business and supporting marketing activities have been specifically directed at the California market.

14. The Settlement Agreement between the Parties is governed by, and construed and interpreted in accordance with, the laws of the State of California and provides that it may be enforced in federal court in the Northern District of California.

**DR. MARTENS TRADE DRESS**

15. AirWair has been manufacturing, marketing, and selling Dr. Martens footwear since 1960. Dr. Martens footwear is famous worldwide, and has been sold in England, throughout Europe and the United States, and in various markets throughout Asia, the Middle East, Australia, New Zealand, Canada, Mexico, and Central and South America.

16. Dr. Martens footwear is widely recognized and extremely popular and has achieved recognition as ranking among the world's greatest and most recognizable brands. The distinctive trade dress of its iconic boots and shoes has been used by the company since 1960 and is world famous. Over the past 40 years, millions of pairs of shoes, boots, and sandals with the distinctive trade dress have been sold in the United States. Dr. Martens footwear has been featured in movies, in magazines, and in public appearances of countless celebrities for decades. In recent years, the footwear has gone viral on social media, featured by numerous influencers.

17. Consumers recognize the trade dress on many different Dr. Martens styles and identify that trade dress with the Dr. Martens brand.

18. The iconic Dr. Martens 1460 boot, virtually unchanged since it was released in 1960, is shown below:



19. The Dr. Martens 1460 boot displays the “**AirWair Classic Trade Dress**,” which combines the following features: 1) yellow welt stitching; 2) a grooved sole edge; 3) an angled heel breast (the front part of the heel); 4) a two-tone sole edge; 5) the DMS sole pattern; 6) the “DMS” cleat pattern; and 7) a yellow-and-black heel loop.

20. The AirWair Classic Trade Dress has been used continuously in the United States since at least 1984. It appears on many of AirWair's most iconic styles, sometimes with slight variations (e.g., the omission of the heel loop on most shoes).




21. In 2013, AirWair began marketing a new style called the “Jadon” boot. This product took elements of the AirWair Classic Trade Dress, which consumers recognize

1 and associate with the Dr. Martens brand. The Jadon boot ultimately became a  
2 commercial success.

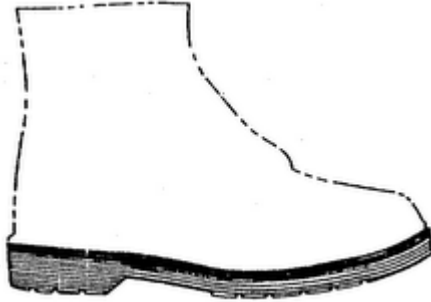


3 22. The trade dress displayed on the Jadon boot combines the following  
4 features: 1) contrast welt stitching; 2) a grooved sole edge; 3) an angled heel; 4) a  
5 distinctive, double-layered platform sole; 5) the AirWair “Quad” cleat pattern; and 6) a  
6 yellow and black heel loop (“**Jadon Trade Dress**”):





16 23. AirWair holds registrations for various trade dress elements and trademarks  
17 throughout the world, including but not limited to the following registrations in the United  
18 States Patent and Trademark Office. *See* Exhibit 1. (The Marks depicted in these  
19 registrations are referred to herein as the “**AirWair Registered Trademarks.**”)  
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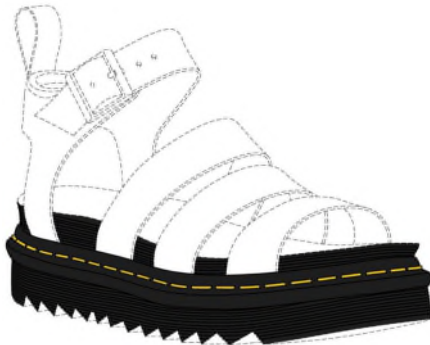

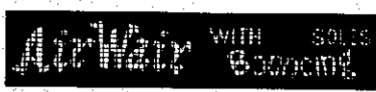
Trade Dress Mark <sup>1</sup>	Design Element (where applicable)	Goods/Services
<b>Footwear Design</b> 2,437,750 03/27/2001  <b>*INCONTESTABLE</b>		Class 25: Footwear  Notes: The mark consists of a welt stitch located around the perimeter of footwear. The phantom lining is not a part the mark, but merely indicates the position of the mark. The drawing of the welt stitch is lined for the color yellow and claim is made to color.
<b>Footwear Design</b> 2,437,751 03/27/2001  <b>*INCONTESTABLE</b>		Class 25: Footwear  Notes: The mark consists of the combination of yellow stitching in the welt area and a two-tone grooved sole edge. The drawing of the welt stitch is lined for the color yellow, and claim is made to color.
<b>Footwear Design</b> <b>(The “DMS undersole”)</b> 2,102,468 10/07/1997  <b>*INCONTESTABLE</b>		Class 25: Footwear  Notes: The mark consists of the design of an undersole. The phantom lining is not a part of the mark, but merely indicates the position of the mark.

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<p><b>Footwear Design</b> 5,067,689 10/25/2016</p> <p><b>*INCONTESTABLE</b></p>		<p>Class 25: Footwear</p> <p>Notes: The mark consists of the design of a sole edge including longitudinal ribbing, and a dark color band over a light color. The phantom lining is not a part of the mark, but merely indicates the position of the mark.</p>
<p><b>Footwear Design</b> 5,067,692 10/25/2016</p> <p><b>*INCONTESTABLE</b></p>		<p>Class 25: Footwear</p> <p>Notes: The mark consists of longitudinal ribbing and a dark color band over a light color on the outer sole edge, welt stitching, and a tab located at the top back heel of footwear.</p>
<p><b>Footwear Design</b> 2,835,657 4/27/2004</p> <p><b>*INCONTESTABLE</b></p>		<p>Class 25: Footwear</p> <p>Notes: The mark consists of the word "AIRWAIR" in stylized yellow lettering on a black loop affixed to the heel of footwear, as shown in the accompanying drawing. The drawing is lined for the colors yellow and black, and color is claimed as a feature of the mark. The phantom lining is not a part of the mark, but merely indicates the position of the mark.</p>

<p>1 <b>Footwear Design</b></p> <p>2 7,039,347</p> <p>3 5/2/2023</p>		<p>Class 25: Footwear</p> <p>The mark consists of a three-dimensional configuration of the midsole of footwear consisting of a combination of contrast stitching in the welt area and a two-tone grooved sole edge. The dotted line portions of the drawing are not part of the mark and serve only to show the position of the mark on the goods.</p>
<p>10 <b>Footwear Design</b></p> <p>11 7,039,348</p> <p>12 5/2/2023</p>		<p>Class 25: Footwear</p> <p>The mark consists of a three-dimensional configuration of the midsole of footwear consisting of a combination of contrast stitching in the welt area and a grooved sole edge on a thick sole. The dotted line portions of the drawing are not part of the mark and serve only to show the position of the mark on the goods.</p>

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<p><b>Footwear Design</b> 7,182,779 10/3/23</p>		<p>Class 25: Footwear</p> <p>The mark consists of a three-dimensional configuration of footwear consisting of a grooved sole edge in black, a two-tiered welt area with rounded edges intersected by yellow stitching, and a grooved footbed edge in black. The dotted line portions of the drawing are not part of the mark and serve only to show the position of the mark on the goods.</p>
<p><b>AIRWAIR (stylized)</b> 2,904,858 11/23/2004  <b>*INCONTESTABLE</b></p>		<p>Class 25: Footwear</p> <p>Notes: Color is not claimed as a feature of the mark.</p>
<p><b>AIRWAIR WITH BOUNCING SOLES</b> 1,940,547 12/12/1995</p>		<p>Class 25: Footwear</p> <p>Notes: The drawing is lined for the color yellow and color is a feature of the mark.</p>
<p><b>WITH BOUNCING SOLES</b> 6,167,927 10/6/2020</p>	<p>WITH BOUNCING SOLES</p>	<p>Class 25: Footwear</p> <p>Notes: The mark consists of standard characters without claim to any particular font style, size or color.</p>

24. Registrations 2,437,750; 2,437,751; 2,102,468; 5,067,689; 5,067,692; 2,835,657; and 2,904,858 have become incontestable within the meaning of 15 U.S.C. §§ 1065 and 1115.

25. The above registrations constitute *prima facie* evidence of the registered marks' validity and, in the case of those registrations that are incontestable, conclusive

evidence of those registered marks' validity and AirWair's exclusive right to use the registered trade dress and trademarks in connection with the goods identified therein.

26. The AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks are unique and distinctive when applied to AirWair's footwear, and they serve to identify the merchandise as high-quality goods from AirWair.

27. The AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks have acquired distinctiveness.

28. The distinctive AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks are non-functional.

29. The AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks qualify as famous marks, as that term is used in 15 U.S.C. § 1125(c)(1), and such marks have been continuously used and never abandoned.

30. In 2021, a jury in this district returned a verdict against another retailer, finding that the AirWair Classic Trade Dress, the Jadon Trade Dress, and each of the AirWair Registered Trademarks that were asserted in that case were valid, famous, and infringed. *See AirWair Int'l Ltd. v. ITX USA, LLC*, No. 3:19-cv-7641-SI (N.D. Cal. Aug. 9, 2021).

31. Prior to engaging in the unlawful acts alleged herein, SHEIN had constructive and actual knowledge of the AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks.

### **SHEIN'S UNLAWFUL ACTS**

32. For purposes of settling the Prior Lawsuit, AirWair and SHEIN entered into the Settlement Agreement. Paragraph 21 of the Settlement Agreement provides that its terms are to be kept confidential. A copy of the Settlement Agreement is filed under seal as Exhibit 2 to this Complaint.

33. Paragraph 6 of the Settlement Agreement prohibits SHEIN from manufacturing, importing, distributing, licensing, selling, marketing, advertising, promoting, or offering for sale footwear bearing certain design elements.

34. Paragraph 11 of the Settlement Agreement sets forth a procedure for AirWair to provide a Breach Notice to SHEIN in the event AirWair claims a breach of the Settlement Agreement.

35. On October 25, 2024, AirWair provided a Breach Notice to SHEIN that certain footwear at www.shein.com infringes AirWair's trade dress and breaches the Settlement Agreement.

36. The October 25 Breach Notice identified 41 separate products, each identified by SKU, name, and image. Those 41 products (the "**October 25 Infringements**") are listed below and pictured in Exhibit 3.

	Style Name	SKU
1	European And American Style Buckle Casual Beach Sandals Thick-Soled Flat Sandals For Summer	Sx2403060535045939
2	2023 New Arrival Women's Soft Leather Boots, British Style Spring & Autumn Ankle Boots, Summer Thin Section, Thick Bottom Short Boots	Sx2310272571928445
3	Women's Fashionable Pink Heart Shaped Thick-Soled Ankle Boots, with Black and Pink Outfit	SX2309157093025829
4	Dream Paris Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up - Gold	Sx2211177712788299
5	Dream Paris Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up - Pink	Sx2211177712740444
6	Goth Women Bat Buckle Décor Lace-up Front Combat Boots, Cool Outdoor Fashion Boots	Rx2307238584849964
7	Balabala Young Fashion Martin Boots	Sx2310164040475049
8	New Lace-Up Boots Women, British Style Mid-Heel Platform Short Boots, Round Toe Ankle Boots For Ladies	sx2408284288433862
9	Faux Leather Lace Up Lug Sole Combat Boots – white	Sx2308186486415203
10	Faux Leather Lace Up Lug Sole Combat Boots – pink	Sx2308180858117191

	Style Name	SKU
11	Women's Platform Ankle Boots Low Heel Chelsea Boots Fashion Slip On Booties – black	sx2308026778152911
12	Women's Platform Ankle Boots Low Heel Chelsea Boots Fashion Slip On Booties – white	sx2308026778119009
13	Women's Pink Fashion Boots with Heart-shaped thick sole Y2k style	sx2309151179663835
14	Women's New Black With Pink Bow Decoration Lace-Up Light Luxury Fashion All-Match Boots Internet Celebrity Fairy Style Princess Series Autumn And Winter Back To School Season Thick Bottom Heightening British Style Casual Outdoor Ankle Boots And Short Boots	sx2407220170297775
15	New Arrival High End Boots British Style Formal Business Wedding Groom Leather Shoes Men's Casual Shoes	sx231230605697661
16	Girls-Boys-Spring-Patent-Combat-Work-Boots-Wedding-Party-Prom-Side-Zipper-Ankle-Boots	Sk2308260459622778
17	Womens Fashionable Lucie Boot	sx2312272562731438
18	Women's Chunky Heel Boots, Fashionable Lace-Up Ankle Boots, Comfortable Ankle Boots	sx2408066197441961
19	New Ankle Boots And Short Boots, Round Toe, Slip-On, Outdoor Casual, Pink Shoelaces, Side Zipper Decoration, Style With Sweater, Pink Sequin Heart Stripe Decoration	sx2406295990508018
20	Women Fashion Ankle Boots, Casual Short Boots, Classic Mid-Calf Boots, Ladies Motorcycle Shoes, Mid-Calf Boots, Women Boots	sx2407065348844371
21	Genuine Leather Boots For Women, 2023 New Collection, British Style, Spring Autumn Single Boots, Thin And Summer Short Boots Featuring Slim And Thick Bottom	Sx2310272571949819
22	Kids' Beige Boots	Sk2310057012215416
23	Men's Thick Sole Anti-Slip Wear-Resistant Round Toe Stylish Spider Web Design Lace-Up Casual Leather Shoes, Retro Fashion And	sx2407307720733312

	Style Name	SKU
	Versatile Business Formal Leather Boots	
24	Women's Platform Chelsea Boots Low Heel Ankle Boots Fashion Slip On Booties	sx2308254757944787
25	Women's Black Short Boots Retro Metal Buckle Round Toe Platform Motorcycle Boots	sx2407086197161863
26	Women's Ankle Boots Fashion Booties Low Heel Lace up Ankle Boots	SX2307202855835711
27	2024 New Thick Sole Boots White Short Ankle Boots For Women, Spring Autumn British Style	sx2112046827192298
28	Children's Boots	sk2309099907087377
29	Women's New Black with Pink Box Decoration Lace-Up Light Luxury Ankle Boots	sx2407229706776390
30	Men's Low-Cut Lace Up Leather Loafers with Round Toe, Suitable For Business, Office, Formal Wear	Sx2401196755872864
31	Faux Leather Lace Up Lug Sole Combat Boots	Sx2308186040979785
32	SHUZIA Women Solid Color Cross Strap Platform Wedge Sandals	sx2401252312031838
33	Women's Lolita Fashion Boots Autumn Winter New Retro Contrast Color Sweet Punk Round Toe Lace-Up Thick Bottom British Ankle Boots	sx2407225153385500
34	Women's Platform Chelsea Boots Low Heel Ankle Boots Fashion Slip On Booties	sx2308254757900262
35	Women's Platform Chelsea Boots Low Heel Ankle Boots Fashion Slip On Booties	sx2308254757959010
36	2024 New Thick Sole Boots White Short Ankle Boots For Women, Spring Autumn British Style	sx2112046827197660
37	Women's Fashionable Motorcycle Boots, British Style, Autumn New Style, Niche Street Explosion, Thick Heel Short Boots In Pink	Sx2309185495646637
38	Shuzia Women's Black PU Iconic Replica Platform Boots	Sx2308184467358951
39	European & American Women Summer Flat Sandals	Sx2403022142424209
40	Men Autumn Boots Men Boots High Top Shoes	sx2407155475256533

	Style Name	SKU
	British Style Work Boots Trendy Shoes Korean Version All Match	
41	SHUZIA Ladies White Trendy Platform New 2024 Combat Fashion Booties Shoe's	Sx2406195517632924

37. Outside counsel for SHEIN responded to the October 25 Breach Notice and stated SHEIN's intent to invoke the Settlement Agreement's cure mechanism for 9 of the products identified in the October 25 Breach Notice.

38. SHEIN ultimately failed to make a timely cure as to any of the products identified in the October 25 Breach Notice.

39. SHEIN also failed to make a timely cure as to six products identified in Breach Notices served by AirWair in April 2022 and June 2023.

40. On November 25, 2024, AirWair sent another Breach Notice to SHEIN—its sixth since entering into the Settlement Agreement—advising SHEIN of 11 additional products that infringed AirWair's trade dress and breached the Settlement Agreement. Again, AirWair identified each product by SKU, name, and image. Those 11 products (the “**November 25 Infringements**”) are listed below and pictured in Exhibit 4.

	Style Name	SKU
1	Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up - baby pink	sx2211177712705066
2	Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up – black	sx2211177712754606
3	Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up – multicolor	sx2211177712788167
4	Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up – red	sx2211177712755883
5	Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up - silver	sx2211177712721002
6	SHUZIA Women's Stitching Platform Combat Boots–Lace-Up With Side Zipper, Trendy Essential	sx2408292341193182

	Style Name	SKU
7	Kids Girls Glitter Ankle Boots Lace Up Waterproof Combat Boots With Side Zipper (Toddler)	sk2305236190947306
8	Women Chunky Lug Sole Lace Up Ankle Boots – black	sx2410086983796686
9	Olivia Miller Girls Toddler Space Case Combat Boots – pink	sk2406196700219155
10	Olivia Miller Girls Toddler Space Case Combat Boots – black	sk2406196700271510
11	Olivia Miller Girls Toddler Space Case Combat Boots - silver	sk2406196700247456

41. SHEIN has thus manufactured, imported, distributed, licensed, sold, marketed, advertised, promoted, and/or offered for sale boots, shoes, and sandals that are direct and obvious copies of the distinctive AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks and that breach the Settlement Agreement. The intent to rip off AirWair can be seen from a comparison of SHEIN’s offerings and genuine Dr. Martens products. Some examples are shown below.

SHEIN’S KNOCK-OFF PRODUCT	GENUINE AIRWAIR PRODUCT
	
<b>SHEIN boots (sx2308026778152911)</b>	<b>Genuine Dr. Martens “2976 Smooth Leather Platform Chelsea Boots”</b>

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SHEIN'S KNOCK-OFF PRODUCT	GENUINE AIRWAIR PRODUCT
	
<p><b>SHEIN boots (Sk2308260459622778)</b></p>	<p><b>Genuine Dr. Martens “1460 Glitter Lace Up Boots”</b></p>
	
<p><b>SHEIN boots (Sx2310272571928445)</b></p>	<p><b>Genuine Dr. Martens “1460 Smooth Leather Boots”</b></p>

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SHEIN'S KNOCK-OFF PRODUCT	GENUINE AIRWAIR PRODUCT
	
SHEIN boots (Sx2308184467358951)	Genuine Dr. Martens “Jadon Smooth Leather Platforms”
	
SHEIN boots (Sx2310272571949819)	Genuine Dr. Martens “1460 Women's Patent Leather Lace Up Boots”

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KANSAS CITY, MISSOURI 64105-2122

SHEIN'S KNOCK-OFF PRODUCT	GENUINE AIRWAIR PRODUCT
	
SHEIN boots (sx2407225153385500)	Genuine Dr. Martens "1460 Women's Contrast Leather Lace Up Boots"
	

SHEIN'S KNOCK-OFF PRODUCT	GENUINE AIRWAIR PRODUCT
	
<b>SHEIN sandal (Sx2403060535045939)</b>	<b>Genuine Dr. Martens “Blair Women’s Brando Leather Strap Sandals”</b>

42. Some of SHEIN’s current offerings are substantially identical to Accused Footwear from the Prior Lawsuit. Some examples are shown below.

Prior Lawsuit Product	Current SHEIN Product
	
<b>2021 SHEIN Boots from Prior Lawsuit (RW210724981137033)</b>	<b>2024 SHEIN Boots (sx2112046827192298)</b>

Prior Lawsuit Product	Current SHEIN Product
	
<b>2021 SHEIN Boots from Prior Lawsuit (Sw2107018313603660)</b>	<b>2024 SHEIN Boots (sx2308026778119009)</b>
	
<b>2021 SHEIN Boots from Prior Lawsuit (SWSHOES08190823730)</b>	<b>2024 SHEIN Boots (sx2308026778152911)</b>

43. Despite being on notice of AirWair's intellectual property rights and notwithstanding receipt of multiple breach notices under the Settlement Agreement, SHEIN deliberately continued to manufacture, import, distribute, license, sell, market, advertise, promote, and/or offer for sale numerous styles that are confusingly similar to the AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks.

44. Upon information and belief, SHEIN intentionally manufactured, imported, distributed, licensed, sold, marketed, advertised, promoted, and/or offered for sale unlawful knock-offs of genuine AirWair products in order to capitalize on the reputation

1 and fame of the Dr. Martens brand. SHEIN's conduct makes this an "exceptional" and  
 2 "willful" case of counterfeiting and infringement within the meaning of 15 U.S.C.  
 3 §§ 1117(a), (b), and (c), because SHEIN knowingly and intentionally marketed, offered,  
 4 and sold knock-off footwear with the intent to confuse consumers. AirWair is therefore  
 5 entitled to treble damages and attorneys' fees.

6 45. The use of the AirWair Classic Trade Dress, Jadon Trade Dress, and  
 7 AirWair Registered Trademarks, or marks that are confusingly similar to any of AirWair's  
 8 marks, on the infringing footwear sold by SHEIN suggests a sponsorship and affiliation  
 9 with AirWair and its products that does not exist.

10 46. SHEIN has no right to use, and is contractually prohibited from using, the  
 11 AirWair Classic Trade Dress, Jadon Trade Dress, or AirWair Registered Trademarks.  
 12 SHEIN's sale, advertisement, distribution, and promotion of the infringing footwear in the  
 13 United States is without authorization or consent from AirWair.

14 47. SHEIN's conduct has been systemic and deliberate. SHEIN has copied the  
 15 AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks in  
 16 a deliberate and calculated attempt to trade upon the popularity and distinctive appearance  
 17 and design of Dr. Martens footwear.

18 48. By reason of SHEIN's acts, AirWair has suffered and will continue to suffer  
 19 damage to its business, reputation, and goodwill, and the loss of sales and profits AirWair  
 20 would have realized but for SHEIN's acts. Unless restrained and enjoined, SHEIN will  
 21 continue to engage in the acts complained of and irreparably damage AirWair. AirWair's  
 22 remedy at law is not adequate to compensate AirWair for all the resulting injuries arising  
 23 from SHEIN's actions.

## 24 **FIRST CLAIM FOR RELIEF**

### 25 **(Breach of Contract)**

26 49. AirWair realleges and incorporates by reference paragraphs 1 through 48 of  
 27 this Complaint.  
 28

1           50. AirWair and SHEIN are parties to the Settlement Agreement, which was  
2 entered into on January 19, 2022.

3           51. The Settlement Agreement is a valid contract in full force and effect at the  
4 time this Complaint is filed and binding on AirWair and on SHEIN.

5           52. AirWair has performed all of its obligations under the Settlement  
6 Agreement.

7           53. By manufacturing, importing, distributing, licensing, selling, marketing,  
8 advertising, promoting, and/or offering for sale products identified in the various Breach  
9 Notices identified herein, SHEIN has breached Paragraph 6 of the Settlement Agreement.

10          54. As a result of SHEIN's breaches, AirWair has suffered and will suffer harm  
11 and is entitled to damages.

## 12                                   **SECOND CLAIM FOR RELIEF**

### 13                           **(Violation of the Implied Covenant of Good Faith and Fair Dealing)**

14          55. AirWair realleges and incorporates by reference paragraphs 1 through 54 of  
15 this Complaint.

16          56. The Settlement Agreement, like every other contract entered into under  
17 California law, imposes upon each party an implied duty of good faith and fair dealing in  
18 the performance and enforcement of that contract.

19          57. SHEIN had a contractual obligation under the Settlement Agreement to  
20 refrain from manufacturing, importing, distributing, licensing, selling, marketing,  
21 advertising, promoting, and/or offering for sale footwear bearing certain designs.

22          58. By repeatedly manufacturing, importing, distributing, licensing, selling,  
23 marketing, advertising, promoting, and/or offering infringing footwear among its vast and  
24 constantly changing product offerings at [www.shein.com](http://www.shein.com), SHEIN has frustrated  
25 AirWair's right to benefit from the Settlement Agreement.

26          59. AirWair entered into the Settlement Agreement with the belief and intent  
27 that it would resolve the Prior Litigation and provide a reasonable extrajudicial means of  
28 addressing any future disputes. AirWair did not anticipate that SHEIN's infringing

1 activities would continue unless AirWair employed a comprehensive program for  
2 monitoring SHEIN's activities to catch infringements.

3 60. SHEIN has therefore breached the covenant of good faith and fair dealing  
4 implied in connection with the performance of the Settlement Agreement, causing harm to  
5 AirWair as a result of AirWair's repeated investment of time and resources expended to  
6 enforce SHEIN's compliance and to address SHEIN's noncompliance with the Settlement  
7 Agreement.

8 **THIRD CLAIM FOR RELIEF**

9 **(Trademark Infringement in Violation of Lanham Act Section 32,**  
10 **15 U.S.C. § 1114)**

11 61. AirWair realleges and incorporates by reference paragraphs 1 through 60 of  
12 this Complaint.

13 62. SHEIN has, on or in connection with footwear products, including the  
14 October 25 Infringements and the November 25 Infringements, used in commerce, a  
15 reproduction, counterfeit, copy, or colorable imitation of one or more of the AirWair  
16 Registered Trademarks in connection with the sale, offering for sale, distribution, and/or  
17 advertising of goods and services, which use is likely to cause confusion, or to cause  
18 mistake, or to deceive.

19 63. SHEIN has, on or in connection with footwear products, reproduced,  
20 counterfeited, copied, and/or imitated one or more of the AirWair Registered Trademarks  
21 and has applied such reproductions, counterfeits, copies, and colorable imitations to  
22 footwear, signs, displays, advertisements, promotional materials, packaging, website  
23 content, and other materials used in commerce in connection with the sale, offering for  
24 sale, distribution, or advertising of goods and services, which use is likely to cause  
25 confusion, or to cause mistake, or to deceive.

26 64. SHEIN is acting and has acted with knowledge that the copying and use of  
27 the AirWair Registered Trademarks is unauthorized, and such imitation is intended to  
28 cause confusion, or to cause mistake, or to deceive.

65. SHEIN's acts are in violation of 15 U.S.C. § 1114, and AirWair has been and is likely to be damaged by these acts.

#### **FOURTH CLAIM FOR RELIEF**

##### **(Federal Unfair Competition and False Designation of Origin in Violation of Lanham Act Section 43(a), 15 U.S.C. § 1125(a))**

66. AirWair realleges and incorporates herein by reference paragraphs 1 through 65 of this Complaint.

67. SHEIN's unlawful copying and use of the AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks in connection with its footwear products is a false and misleading designation of origin, which is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of SHEIN with AirWair, or as to the origin, sponsorship, or approval of SHEIN's goods or commercial activities by AirWair.

68. SHEIN's acts are in violation of 15 U.S.C. § 1125(a), and AirWair has been and is likely to be damaged by these acts.

#### **FIFTH CLAIM FOR RELIEF**

##### **(Federal Trademark Dilution in Violation of Lanham Act Section 43(c), 15 U.S.C. § 1125(c))**

69. AirWair realleges and incorporates herein by reference paragraphs 1 through 68 of this Complaint.

70. The AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks are distinctive and famous in the United States in that they are widely recognized by the general consuming public as a designation of source for AirWair's high quality goods and services.

71. After AirWair's marks became distinctive and famous, SHEIN has used and is using trademarks and trade dress on footwear products, including the October 25 Infringements and the November 25 Infringements, that are substantially indistinguishable from or highly similar to AirWair's.

72. On information and belief, SHEIN acted with knowledge of the fame and reputation of the AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks with the purpose of usurping such rights and to willfully and intentionally confuse, mislead, and deceive members of the public.

73. SHEIN's actions have and are likely to dilute, blur, and tarnish the distinctive quality of the AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks, and to lessen the capacity of those marks to identify and distinguish the company's products.

74. SHEIN's acts are in violation of 15 U.S.C. § 1125(c), and AirWair has been and is likely to be damaged by these acts. Unless SHEIN is restrained, AirWair will continue to suffer damages and injury to its reputation and goodwill.

75. Because SHEIN acted willfully and intentionally to trade on AirWair's reputation and cause dilution of its famous AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks, AirWair is entitled to damages, fees, and costs pursuant to 15 U.S.C. § 1125(c)(5).

### **SIXTH CLAIM FOR RELIEF**

#### **(Unfair Competition in Violation of Cal. Bus.**

#### **& Prof. Code Section 17200 *et seq.*)**

76. AirWair realleges and incorporates herein by reference paragraphs 1 through 75 of this Complaint.

77. SHEIN's acts, including the unlawful use and imitation of the AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks in connection with the manufacture, marketing, distribution, and sale of footwear products, constitute an unlawful, unfair and/or fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising, in violation of California Business and Professions Code § 17200 *et seq.*

78. SHEIN's pattern and practice of imitating the AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair Registered Trademarks in connection with footwear

1 products, and of trading upon AirWair's goodwill and reputation, constitutes an unfair  
2 business practice in violation of California Business and Professions Code § 17200 *et seq.*

3 79. SHEIN's conduct was willful, and AirWair has been and is likely to be  
4 damaged by this conduct.

### 5 **SEVENTH CLAIM FOR RELIEF**

#### 6 **(Common Law Unfair Competition)**

7 80. AirWair realleges and incorporates by reference paragraphs 1 through 79 of  
8 this Complaint.

9 81. SHEIN's use and imitation of the AirWair Classic Trade Dress, Jadon Trade  
10 Dress, and AirWair Registered Trademarks in its footwear constitutes infringement,  
11 passing off, copying, imitation, and misappropriation of AirWair's intellectual property,  
12 unjust enrichment of SHEIN, and unfair competition with AirWair in violation of  
13 AirWair's rights under the common law of the State of California and other states of the  
14 United States.

15 82. SHEIN's willful acts of misrepresentation, fraud, and deceit have unjustly  
16 enriched SHEIN by exploiting AirWair's reputation in the market, caused harm to  
17 AirWair, and violated AirWair's rights.

### 18 **EIGHTH CLAIM FOR RELIEF**

#### 19 **(Dilution in Violation of Cal. Bus. & Prof. Code**

#### 20 **Section 14200 *et seq.*)**

21 83. AirWair realleges and incorporates by reference paragraphs 1 through 82 of  
22 this Complaint.

23 84. The AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair  
24 Registered Trademarks are famous and distinctive in California, in that they are widely  
25 recognized by the general consuming public as a strong designation of source of  
26 AirWair's high quality goods and services.

27 85. After the AirWair Classic Trade Dress, Jadon Trade Dress, and AirWair  
28 Registered Trademarks became famous in California, SHEIN began using trade dress and

1 trademarks in connection with the infringing footwear that are substantially identical to  
2 AirWair's.

3 86. SHEIN's actions have diluted, blurred, and tarnished the strong and positive  
4 associations represented by the AirWair Trade Dress, Jadon Trade Dress, and AirWair  
5 Registered Trademarks by lessening their capacity to identify and distinguish AirWair's  
6 products and by causing AirWair's products and the AirWair Classic Trade Dress, Jadon  
7 Trade Dress, and AirWair Registered Trademarks to be associated with footwear not  
8 made, sponsored, or approved by AirWair.

9 87. SHEIN acted willfully and intentionally to trade on AirWair's reputation  
10 and cause dilution of its famous trade dress and trademarks.

11 88. SHEIN's acts are in violation of California Business & Professions Code  
12 sections 14200 *et seq.*, and AirWair has been and is likely to be damaged by these acts.

13 89. AirWair has been damaged by way of lost sales and harm to its reputation.

### 14 **PRAYER FOR RELIEF**

15 Wherefore, AirWair prays for judgment in its favor and against SHEIN:

16 A. A preliminary and permanent injunction enjoining ZoeTop Business  
17 Company, Limited, its officers, shareholders, agents, servants, employees, attorneys,  
18 successors and assigns, affiliates, suppliers, manufacturers, distributors, business partners,  
19 e-tailers, retailers, and those in privity with SHEIN, and those persons in active concert or  
20 participation with any of them who receive actual notice of the judgment by personal  
21 service or otherwise, from manufacturing, importing, distributing, licensing, selling,  
22 marketing, advertising, promoting, or offering for sale the October 25 Infringements, the  
23 November 25 Infringements, or any other footwear products that use, imitate, or copy any  
24 of the AirWair Classic Trade Dress, Jadon Trade Dress, and/or any of the features  
25 described in the AirWair Registered Trademarks ("**Enjoined Footwear**").

26 B. An Order directing SHEIN to file with this Court and serve on AirWair's  
27 counsel within 30 days after service of an injunction, a report under oath setting forth in  
28 detail the manner and form in which SHEIN has complied with the injunction.

1 C. An Order that (1) all point-of-sale materials, labels, signs, boxes, prints,  
2 catalogs, line sheets, marketing materials, internet web pages, metatags, packages, papers,  
3 other trade dress, and advertisements in the possession or control of SHEIN bearing  
4 images, illustrations, or representations of Enjoined Footwear, AirWair Classic Trade  
5 Dress, Jadon Trade Dress, AirWair Registered Trademarks, Dr. Martens® name, AirWair  
6 name, and undersole patterns, and all plates, molds, matrixes, and other means of making  
7 the same, be delivered to AirWair's counsel or destroyed in accordance with written  
8 instructions from AirWair; and (2) that all Enjoined Footwear be delivered to AirWair or  
9 destroyed in accordance with written instructions from AirWair.

10 D. An accounting of SHEIN's profits arising from SHEIN's unfair competition  
11 and trademark infringement.

12 E. An award of SHEIN's profits on sale of Enjoined Footwear to AirWair.

13 F. Liquidated damages pursuant to the Settlement Agreement.

14 G. An award of actual damages sustained by AirWair.

15 H. An order that SHEIN must engage in corrective advertising.

16 I. In the alternative to actual damages and profits, an award of statutory  
17 damages in an amount of not more than \$2,000,000 per counterfeit mark per type of  
18 services and/or goods sold or offered for sale by SHEIN.

19 J. An award of treble the actual damages awarded for use of a counterfeit mark  
20 pursuant to 15 U.S.C. § 1117(b). AirWair reserves the right to elect, any time before final  
21 judgment, statutory damages under 15 U.S.C. § 1117(c) in lieu of actual damages and  
22 profits.

23 K. Pre-judgment and post-judgment interest on the above damage awards.

24 L. An award of costs and reasonable attorney's fees and expenses incurred by  
25 AirWair in connection with this action and in accordance with the terms of the Settlement  
26 Agreement.

27 M. Such other and further relief which this Court may deem just.  
28

**DEMAND FOR JURY TRIAL**

AirWair hereby demands a trial by jury.

Dated: November 25, 2024

**BRYAN CAVE LEIGHTON PAISNER LLP**

By: /s/ K. Lee Marshall

Kenneth Lee Marshall

Attorneys for Plaintiff

AIRWAIR INTERNATIONAL LTD.

BRYAN CAVE LEIGHTON PAISNER LLP  
ONE KANSAS CITY PLACE  
1200 MAIN STREET, SUITE 3800  
KANSAS CITY, MISSOURI 64105-2122

# **Exhibit 1**

# Reg. No. 2,437,750

Int. Cl.: 25

Prior U.S. Cl.: 39

United States Patent and Trademark Office

Reg. No. 2,437,750  
Registered Mar. 27, 2001

## TRADEMARK PRINCIPAL REGISTER



R.GRIGGS GROUP LIMITED (UNITED KING-  
DOM CORPORATION)  
COBBS LANE, WOLLASTON  
WELLINGBOROUGH, NORTHANTS NN8 7SW,  
UNITED KINGDOM

FOR: FOOTWEAR, IN CLASS 25 (U.S. CL. 39).

FIRST USE 4-1-1960; IN COMMERCE 0-0-1984.

THE DRAWING OF THE WELT STITCH IS LINED  
FOR THE COLOR YELLOW AND CLAIM IS MADE  
TO COLOR.

THE MARK CONSISTS OF A WELT STITCH  
LOCATED AROUND THE PERIMETER OF FOOT-  
WEAR. THE PHANTOM LINING IS NOT A PART  
THE MARK, BUT MERELY INDICATES THE POSI-  
TION OF THE MARK.

SEC. 2(F).

SER. NO. 74-494,463, FILED 2-25-1994.

CATHERINE KAISER KREBS, EXAMINING AT-  
TORNEY

# Reg. No. 2,437,751

Int. Cl.: 25

Prior U.S. Cl.: 39

**United States Patent and Trademark Office**

**Reg. No. 2,437,751**

Registered Mar. 27, 2001

## TRADEMARK PRINCIPAL REGISTER



R. GRIGGS GROUP LIMITED (UNITED KINGDOM CORPORATION)  
COBBS LANE, WOLLASTON, WELLINGBOROUGH  
NORTHANTS NN8 7SW, UNITED KINGDOM

FOR: FOOTWEAR, IN CLASS 25 (U.S. CL. 39).

FIRST USE 4-1-1960; IN COMMERCE 0-0-1984.

THE DRAWING OF THE WELT STITCH IS LINED  
FOR THE COLOR YELLOW, AND CLAIM IS MADE  
TO COLOR.

THE MARK CONSISTS OF THE COMBINATION  
OF YELLOW STITCHING IN THE WELT AREA  
AND A TWO-TONE GROOVED SOLE EDGE.

SEC. 2(F).

SER. NO. 74-494,466, FILED 2-25-1994.

CATHERINE KAISER KREBS, EXAMINING ATTORNEY

# Reg. No. 2,102,468

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

Reg. No. 2,102,468

**United States Patent and Trademark Office**

Registered Oct. 7, 1997

## TRADEMARK PRINCIPAL REGISTER



R. GRIGGS GROUP LIMITED (UNITED KING-  
DOM CORPORATION)  
COBBS LANE, WOLLASTON, WELLINGBOR-  
OUGH  
NORTHANTS NN8 7SW, UNITED KINGDOM

FOR: FOOTWEAR, IN CLASS 25 (U.S. CLS. 22  
AND 39).

FIRST USE 8-0-1992, FIRST USED IN AN-  
OTHER FORM IN 1978; IN COMMERCE

9-0-1992, FIRST USED IN COMMERCE IN AN-  
OTHER FORM IN 1984.

THE PHANTOM LINING IS NOT A PART OF  
THE MARK, BUT MERELY INDICATES THE  
POSITION OF THE MARK.

THE MARK CONSISTS OF THE DESIGN OF  
AN UNDERSOLE.

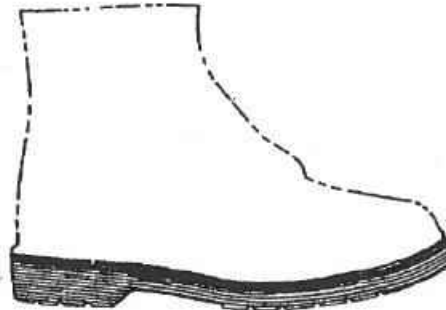
SER. NO. 74-502,418, FILED 3-21-1994.

JEFFREY LOOK, EXAMINING ATTORNEY

## Reg. No. 5,067,689

# United States of America

United States Patent and Trademark Office



**Reg. No. 5,067,689**

**Registered Oct. 25, 2016**

**Int. Cl.: 25**

**Trademark**

**Principal Register**

Airwair International Ltd. (UNITED KINGDOM CORPORATION)  
Cobb's Lane, Wollaston  
Northamptonshire UNITED KINGDOM NN297SW

CLASS 25: Footwear

FIRST USE 00-00-1960; IN COMMERCE 00-00-1984

The mark consists of the design of a sole edge including longitudinal ribbing, and a dark color band over a light color. The phantom lining is not a part of the mark, but merely indicates the position of the mark.

OWNER OF U.S. REG. NO. 2437751, 2437750, 2104349

SEC.2(F)

SER. NO. 86-939,691, FILED 03-14-2016  
EUGENIA K MARTIN, EXAMINING ATTORNEY



*Michelle K. Lee*

Director of the United States  
Patent and Trademark Office

**Reg. No. 5,067,692**

**United States of America**  
United States Patent and Trademark Office



**Reg. No. 5,067,692**

**Registered Oct. 25, 2016**

**Int. Cl.: 25**

**Trademark**

**Principal Register**

Airwair International Ltd. (UNITED KINGDOM CORPORATION)  
Cobb's Lane, Wollaston  
Northamptonshire UNITED KINGDOM NN297SW

CLASS 25: Footwear

FIRST USE 00-00-1960; IN COMMERCE 00-00-1984

The mark consists of longitudinal ribbing and a dark color band over a light color on the outer sole edge, welt stitching, and a tab located at the top back heel of footwear. The phantom lining is not a part of the mark, but merely indicates the position of the mark.

OWNER OF U.S. REG. NO. 2437750, 2341976, 2104349

SEC.2(F)

SER. NO. 86-939,740, FILED 03-14-2016  
EUGENIA K MARTIN, EXAMINING ATTORNEY



*Michelle K. Lee*

Director of the United States  
Patent and Trademark Office

# Reg. No. 2,835,657

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

United States Patent and Trademark Office

Reg. No. 2,835,657

Registered Apr. 27, 2004

## TRADEMARK PRINCIPAL REGISTER



R. GRIGGS GROUP LIMITED (UNITED KING-  
DOM CORPORATION)  
NENE PARK STATION ROAD  
IRTHLINGBOROUGH, NORTHANTS, UNITED  
KINGDOM NN9 5QG

FOR: FOOTWEAR, IN CLASS 25 (U.S. CLS. 22 AND  
39).

FIRST USE 0-0-1960; IN COMMERCE 0-0-1984.

OWNER OF U.S. REG. NOS. 1,940,547, 1,946,294  
AND OTHERS.

NO CLAIM IS MADE TO THE EXCLUSIVE  
RIGHT TO USE THE DESIGN OF A LOOP LOCA-  
TED AT THE TOP OF THE HEEL OF FOOTWEAR,  
APART FROM THE MARK AS SHOWN.

THE DRAWING IS LINED FOR THE COLORS  
YELLOW AND BLACK, AND COLOR IS CLAIMED  
AS A FEATURE OF THE MARK. THE PHANTOM  
LINING IS NOT A PART OF THE MARK, BUT  
MERELY INDICATES THE POSITION OF THE  
MARK

THE MARK CONSISTS OF THE WORD "AIR-  
WAIR" IN STYLIZED YELLOW LETTERING ON A  
BLACK LOOP AFFIXED TO THE HEEL OF FOOT-  
WEAR, AS SHOWN IN THE ACCOMPANYING  
DRAWING.

SER. NO. 75-450,053, FILED 3-13-1998.

DOUGLAS LEE, EXAMINING ATTORNEY

**Reg. No. 7,039,347**

**United States of America**  
United States Patent and Trademark Office



**Reg. No. 7,039,347**  
**Registered May 02, 2023**  
**Int. Cl.: 25**  
**Trademark**  
**Principal Register**

Airwair International Ltd. (UNITED KINGDOM CORPORATION)  
Cobb's Lane, Wollaston  
Northamptonshire, UNITED KINGDOM NN297SW

CLASS 25: Footwear

FIRST USE 00-00-1960; IN COMMERCE 00-00-1984

The mark consists of a three-dimensional configuration of the midsole of footwear consisting of a combination of contrast stitching in the welt area and a two-tone grooved sole edge. The dotted line portions of the drawing are not part of the mark and serve only to show the position of the mark on the goods.

OWNER OF U.S. REG. NO. 2437751, 5067692, 5067689

SEC.2(F)

SER. NO. 88-857,194, FILED 04-02-2020

*Katherine Kelly Vidal*

Director of the United States  
Patent and Trademark Office



**Reg. No. 7,039,348**

**United States of America**  
United States Patent and Trademark Office



**Reg. No. 7,039,348**

**Registered May 02, 2023**

**Int. Cl.: 25**

**Trademark**

**Principal Register**

Airwair International Ltd. (UNITED KINGDOM CORPORATION)  
Cobb's Lane, Wollaston  
Northamptonshire, UNITED KINGDOM NN297SW

CLASS 25: Footwear

FIRST USE 00-00-1995; IN COMMERCE 00-00-1995

The mark consists of a three-dimensional configuration of the midsole of footwear consisting of a combination of contrast stitching in the welt area and a grooved sole edge on a thick sole. The dotted line portions of the drawing are not part of the mark and serve only to show the position of the mark on the goods.

OWNER OF U.S. REG. NO. 2437751, 5067692, 5067689

SEC.2(F)

SER. NO. 88-857,201, FILED 04-02-2020

*Katherine Kelly Vidal*

Director of the United States  
Patent and Trademark Office



**Reg. No. 7,182,779**

**United States of America**  
United States Patent and Trademark Office



**Reg. No. 7,182,779**  
**Registered Oct. 03, 2023**  
**Int. Cl.: 25**  
**Trademark**  
**Principal Register**

AIRWAIR INTERNATIONAL LTD. (UNITED KINGDOM CORPORATION)  
COBB'S LANE, WOLLASTON  
NORTHAMPTONSHIRE, UNITED KINGDOM NN297SW

CLASS 25: footwear

FIRST USE 3-1-2018; IN COMMERCE 3-1-2018

The color(s) yellow and black is/are claimed as a feature of the mark.

The mark consists of a three-dimensional configuration of footwear consisting of a grooved sole edge in black, a two-tiered welt area with rounded edges intersected by yellow stitching, and a grooved footbed edge in black. The dotted line portions of the drawing are not part of the mark and serve only to show the position of the mark on the goods.

OWNER OF U.S. REG. NO. 2437751, 5067692, 2437750

SEC.2(F)

SER. NO. 97-636,209, FILED 10-18-2022



*Katherine Kelly Vidal*

Director of the United States  
Patent and Trademark Office



# Reg. No. 2,904,858

## United States of America

United States Patent and Trademark Office

*AirWair*

**Reg. No. 2,904,858**

**Registered Nov. 23, 2004**

**New Cert. Aug. 26, 2014**

**Int. Cl.: 25**

**TRADEMARK**

**PRINCIPAL REGISTER**

AIRWAIR INTERNATIONAL LTD. (UNITED KINGDOM CORPORATION)  
COHEN LANE  
WOLLASTON, NORTHAMPTONSHIRE, UNITED KINGDOM NN29 7SW

FOR [CLOTHING, NAMELY:] FOOTWEAR [COATS, JACKETS, ANORAKS, PARKAS, T-SHIRTS, POLO SHIRTS, LONG AND SHORT SLEEVED SHIRTS, BLOUSES, TANK TOPS, SWEATERS, SWEATSHIRTS, SWEATPANTS, PANTS, JEANS, SHORTS, SKIRTS, DRESSES, VESTS, WAISTCOATS, BELTS, SOCKS, HATS, GLOVES, AND CAPS], IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 1-1-1960; IN COMMERCE 9-1-1984.

OWNER OF U.S. REG. NOS. 1,940,547, 1,940,548 AND 1,946,294.

SER. NO. 78-254,712, FILED 6-5-2003



*Nichelle K. Lee*  
Deputy Director of the United States  
Patent and Trademark Office

# Reg. No. 1,940,547

Int. Cl.: 25

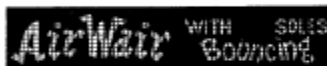
Prior U.S. Cl.: 39

**United States Patent and Trademark Office**

Reg. No. 1,940,547

Registered Dec. 12, 1995

**TRADEMARK  
PRINCIPAL REGISTER**



R.GRIGGS GROUP LIMITED (UNITED KING-  
DOM CORPORATION)  
COBBS LANE, WOLLASTON  
WELLINGBOROUGH, NORTHANTS NN8 7SW,  
UNITED KINGDOM

FOR: FOOTWEAR, IN CLASS 25 (U.S. CL. 39).  
FIRST USE 4-0-1961; IN COMMERCE  
9-0-1984.

OWNER OF U.S. REG. NO. 1,517,274.

NO CLAIM IS MADE TO THE EXCLUSIVE  
RIGHT TO USE "SOLES", APART FROM THE  
MARK AS SHOWN.

THE DRAWING IS LINED FOR THE COLOR  
YELLOW AND COLOR IS A FEATURE OF  
THE MARK.

SER. NO. 74-522,326, FILED 5-4-1994.

MARY ROSSMAN, EXAMINING ATTORNEY

**Reg. No. 6,167,927**

---

**United States of America**  
United States Patent and Trademark Office

**WITH BOUNCING SOLES**

**Reg. No. 6,167,927**

**Registered Oct. 06, 2020**

**Int. Cl.: 25**

**Trademark**

**Principal Register**

AIRWAIR INTERNATIONAL LTD. (UNITED KINGDOM CORPORATION)

Cobb's Lane

Wollaston, Northants, UNITED KINGDOM NN297SW

CLASS 25: Footwear; Clothing, namely, shirts, socks, hats, and scarves

FIRST USE 00-00-1965; IN COMMERCE 9-00-1984

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

OWNER OF U.S. REG. NO. 3070408, 1940547, 3070409, 1940548

No claim is made to the exclusive right to use the following apart from the mark as shown:  
"SOLES" FOR FOOTWEAR IN INTERNATIONAL CLASS 025

SER. NO. 88-820,543, FILED 03-04-2020



*Andrew K. ...*

Director of the United States  
Patent and Trademark Office



# **Exhibit 2**

**FILED UNDER SEAL**

# **Exhibit 3**

## European And American Style Buckle Casual Beach Sandals Thick-Soled Flat Sandals For Summer - Sx2403060535045939

FREE STANDARD SHIPPING  
ON ORDERS OF \$9.9+ **TODAY SHIP0425**

FREE RETURNS  
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Home / Shoes / Women Shoes / Women Sandals / Women Platform & Wedge Sandals / Women's New European And American Style Buckle Casual Beach Sandals Thick-Soled Flat Sandals For Summer

Someone bought this within 14 hours

Marketplace




Women's New European And American Style Buckle Casual Beach Sandals Thick-Soled Flat Sandals For Summer  
SKU: SX2403060535045939 15 Reviews

**\$19.20** ~~\$24.99~~ -23%

More 4 purchased at \$4.35

Color: Black Large image



Size: US Size ▾

US6 (CN36)

US6.5 (CN37)

US7 (CN38)

**US7.5 (CN39)**

US8 (CN40)

US8.5 (CN41)

US9.5 (CN42)

US10 (CN43)

Tip: Read To Note

Size Guide

Qty: 1

**ADD TO CART**

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4/25/2024 1:08:28 PM

https://us.shein.com/Women-s-New-European-And-American-Style-Buckle-Casual-Beach-Sandals-Thick-Soled-Flat-Sandals-For-Summer-p-31278287.html

1












## Women's Fashionable Pink Heart Shaped Thick-soled Ankle Boots, With Black and Pink Outfit - SX2309157093025829

**SHEIN** FREE STANDARD SHIPPING ON ORDERS OF \$29+

Home / Shoes / Women Shoes / Women Fashion Boots / Women Ankle Boots & Booties / Women Fashionable Pink Heart Shaped Thick-soled Ankle Boots, With Black And Pink Outfit



Women's Fashionable Pink Heart Shaped Thick-soled Ankle Boots, With Black And Pink Outfit  
SKU: SX2309157093025829

**\$27.60** ~~\$33.40~~ -15%

Color: Pink [Large Image](#)

Size: US Size

US5.5 (CN33)	US6 (CN36)	US6.5 (CN37)
US7 (CN38)	US7.5 (CN39)	US8 (CN40)
US8.5 (CN41)	US9 (CN42)	

Size Guide

Qty: 1

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10/11/2023 10:49:23 AM  
<https://us.shein.com/Women-s-Fashionable-Pink-Heart-Shaped-Thick-soled-Ankle-Boots-With-Black-And-Pink-Outfit-p-23347975-cat-1748.html?mallCode=1>

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## Dream Paris Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up - Sx2211177712788299

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0 0 0 0 0

0



DREAM PAIRS Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up

SX2211177712788299 [View Reviews](#)

**\$36.89** ~~\$40.00~~ -18%

Color: Gold [Large image](#)

Size

US1 US2 US3 US4 US5

US6 US7 US8 US9 US10 US11 US12 US13

Qty: 1

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Delivery Tracking

5/10/2023 2:46:31 PM

<https://us.shein.com/topshoesUS-DREAM-PAIRS-Girls-Boys-Glitter-Ankle-Boots-Side-Zipper-Combat-Shoes-with-Lace-Up-p-12289057>





## Dream Paris Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up - Sx2211177712740444

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SHEIN
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[Home](#) / [Kids Shoes](#) / [Kids Boots](#) / [DREAM PAIRS Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up](#)

**Slip-Resistant Sole**  
Durable outsole provides grip & traction

DREAM PAIRS Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up

SKU: sx2211177712740444

**\$36.89** ~~\$44.89~~ -10%

Color: Pink [Large image](#)

Size

US1	US2	US3	US4	US5
US6	US10	US11	US12	US13

Qty: 1

QuickShip: US is eligible for QuickShip

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Shipping To United States

Delivery ID  
QuickShip will provide a faster delivery service between 3-5 business days

5/10/2023 2:42:23 PM

https://us.shein.com/topshoesUS-DREAM-PAIRS-Girls-Boys-Glitter-Ankle-Boots-Side-Zipper-Combat-Shoes-with-Lace-Up-p-12289586-





## Goth Women Bat Buckle Décor Lace-up Front Combat Boots Cool Outdoor Fashion Boots - Rx2307238584849964

**SHEIN** FREE STANDARD SHIPPING ON ORDERS OF \$29+

Categories: Women > Shoes > Women Fashion Boots > Women Combat Boots > Goth Women Bat Buckle Décor Lace-up Front Combat Boots, Cool Outdoor Fashion Boots.

**ROMWE**

Goth Women Bat Buckle Décor Lace-up Front Combat Boots > Cool Outdoor Fashion Boots  
SKU: R2307238584849964 ★★★★★ 100 reviews  
Reviews: 100%

**\$27.90** ~~33.00~~ -15%  
Make a purchase of \$1.00 **FREE**

Size: US Size  
US6 (CN36) US6.5 (CN37) US7 (CN38)  
US7.5 (CN39) US8 (CN40) US8.5 (CN41)  
US9 (CN42)

Tip: One Size Fits Most Last: High Last (3.5cm) 1.5cm  
New Order Check My Size

Qty:

**ADD TO CART**

From us to 21.6-21.6 From calculated at checkout

Shipping To United States

10/11/2023 10:15:58 AM  
https://us.shein.com/Goth-Women-Bat-Buckle-Décor-Lace-up-Front-Combat-Boots-Cool-Outdoor-Fashion-Boots-p-20496962-cat-1748.html?mallCode=1

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## Balabala Young Fashion Martin Boots - Sx2310164040475049


11/9/23, 8:37 PM balabala Young Fashion Martin Boots | SHEIN USA

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balabala Young Fashion Martin Boots  
SKU: sk2310164040475049  
**\$25.76** ~~\$36.60~~ -30%  
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**Size**

EUR26 EUR27 EUR28 EUR29 EUR30 EUR31 EUR32  
EUR33 EUR34 EUR35 EUR36 EUR37 **EUR38**

[Size Guide](#)

Qty: **1** [Only 4 Left](#)

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**About Brand**

**Balabala** [View Products](#)  
Balabala is a children's fashion brand that continuously protects and fosters growth and serves new-generation families worldwide by providing clothing and supplies solutions for children aged 0-14. It is committed to inspiring growth through fashion and providing children worldwide with a happy childhood.

**Shipping To United States**

**Delivery** [View Details](#)

Standard Shipping **\$3.99** FREE on orders \$29.00+  
Estimated to be delivered on 11/11/2023 - 11/11/2023  
77.13% are ≤ 18 days

Express Shipping **\$12.90** FREE on orders \$129.00+  
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88.94% are ≤ 7 days

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[https://us.shein.com/balabala-Young-Fashion-Martin-Boots-p-24706255-cat-2074.html?src\\_identifier=st%3D2%60sc%3Dmartin boots%60sr%3D0%60ps%3D1&src\\_module=search&src\\_tab\\_page\\_id=...](https://us.shein.com/balabala-Young-Fashion-Martin-Boots-p-24706255-cat-2074.html?src_identifier=st%3D2%60sc%3Dmartin%20boots%60sr%3D0%60ps%3D1&src_module=search&src_tab_page_id=...) 1/4







## New Lace-Up Boots Women, British Style Mid-Heel Platform Short Boots, Round Toe Ankle Boots For Ladies - sx2408284288433862

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\*CONDITIONS APPLY

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Sports & Outdoors

Home Textile

Electronics

Home

Shoes

Women Shoes

Women Fashion Boots

Women Ankle Boots & Booties

New Lace-Up Boots Women, British Style Mid-Heel Platform Short Boots, Round Toe Ankle Boots For Ladies

New Lace-Up Boots Women, British Style Mid-Heel Platform Short Boots, Round Toe Ankle Boots For Ladies

SKU: sx2408284288433862

NEW

\$34.70

544-70

22%

✓ Eligible to get FREE SHIPPING

Size

US Size

US5.5 (CN35)

US6 (CN36)

US6.5 (CN37)

US7 (CN38)

US7.5 (CN39)

US8 (CN40)

US8.5 (CN41)

US9 (CN42)

US9.5 (CN43)

Tip: True To Size, Mid Heel (Non-Drift)

Size Guide

Qty:

1

ADD TO CART

Free Shipping

Standard Shipping Delivery: 08/17/2024 - 09/29/2024

Just to get \$5 shipping (coupon code: \$4.99 CLIN)

Return Policy

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9/6/2024 10:37:29 AM

https://us.shein.com/New-Lace-Up-Boots-Women-British-Style-Mid-Heel-Platform-Short-Boots-Round-Toe-Ankle-Boots-For-Ladies





**Faux Leather Lace Up Lug Sole Combat Boots - Sx2308186486415203**

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Fast Leather Lace Up Lug Sole Combat Boots  
SKU: 23654371.html#mgfatio=3&idmainattr=27\_1000136&mailCode=1

**\$22.50** ~~\$50.00~~ -55%

Color: White [Large Image](#)







Size: US Size ▾

US6.0	US6	US6.5	US7	US7.5
US8	US8.5	US9	US10	

Type: Anti-Hole (Anti-Mosquito)

 Show Details

Qty:

**ADD TO CART** 

0 item up to \$2,100 (21 items) excluded in discount.

 Free Shipping @

Free standard shipping on orders over \$29.95.  
Estimated 14 to 18 business days (US-1778834 - US-1802334).  
\$5.99/week x 10 days





## Faux Leather Lace Up Lug Sole Combat Boots - Sx2308180858117191

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FREE RETURNS

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Home / Shoes / Women's Shoes / Women's Fashion Shoes / Women's Combat Boots & Boots / Faux Leather Lace Up Lug Sole Combat Boots



Faux Leather Lace-Up Lug Sole Combat Boots

SXL us2308180858117191

\$21.75

\$44.00

50%

Color: PINK

Large image

Size: US 6.5

US 5 US 5.5 US 6 US 6.5 US 7 US 7.5 US 8 US 8.5 US 9 US 9.5 US 10

1 per 1000 items (US 5.5 - 9.5)

Size Guide

Qty: 1

ADD TO CART

Free Shipping @

Free shipping on orders over \$29.99. Estimated by the delivery date (US 5.5 - 9.5) 75.50% are < 10 days

3/6/2024 3:35:35 PM

https://us.shein.com/Faux-Leather-Lace-Up-Lug-Sole-Combat-Boots-p-23779795.html?&imgRatio=3-4&main\_attr=27\_739&mallCode=1

28





## Women's Platform Ankle Boots Low Heel Chelsea Boots Fashion Slip On Booties - sx2308026778152911

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\*CONDITIONS APPLY

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Home Textile

Electronics

Home

Shoes

Women Shoes

Women Fashion Shoes

Women Ankle Boots & Chelsea

Women's Platform Ankle Boots Low Heel Chelsea Boots Fashion Slip On Booties

Marketplace

Women's Platform Ankle Boots Low Heel Chelsea Boots Fashion Slip On Booties

SKU: sx2308026778152911

★ ★ ★ ★ ★

23 Reviews

\$22.64

\$49.99

55%

✓ Eligible to get FREE SHIPPING

Color

Black

Large image

Size

US size

US6

US7

US8

US9

US10

US11

US6, US10, US11 are eligible for QuickShip

Qty:

1

ADD TO CART

♥

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Customer Reviews

9/6/2024 10:17:58 AM

https://us.shein.com/Women-s-Platform-Ankle-Boots-Low-Heel-Chelsea-Boots-Fashion-Slip-On-Booties





## Women's Platform Ankle Boots Low Heel Chelsea Boots Fashion Slip On Booties - sx2308026778119009

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Home / Shoes / Women Shoes / Women Fashion Boots / Women Ankle Boots & Studs / Women's Platform Ankle Boots Low Heel Chelsea Boots Fashion Slip On Booties

Marketplace



Women's Platform Ankle Boots Low Heel Chelsea Boots Fashion Slip On Booties

SX2308026778119009


★★★★★ 237 Reviews

**\$22.64** ~~\$48.00~~ **51%**

✓ Eligible to get FREE SHIPPING

Color: White

Large image



Size: US 9

US6 US7 US8 US9 US10 US11

US6, US10, US11 are eligible for **QuickShip**

Qty: 1 **Only 8 left**

**ADD TO CART**  
Only 8 left

♥

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Customer Reviews

9/5/2024 10:18:34 AM

<https://us.shein.com/Women-s-Platform-Ankle-Boots-Low-Heel-Chelsea-Boots-Fashion-Slip-On-Booties>

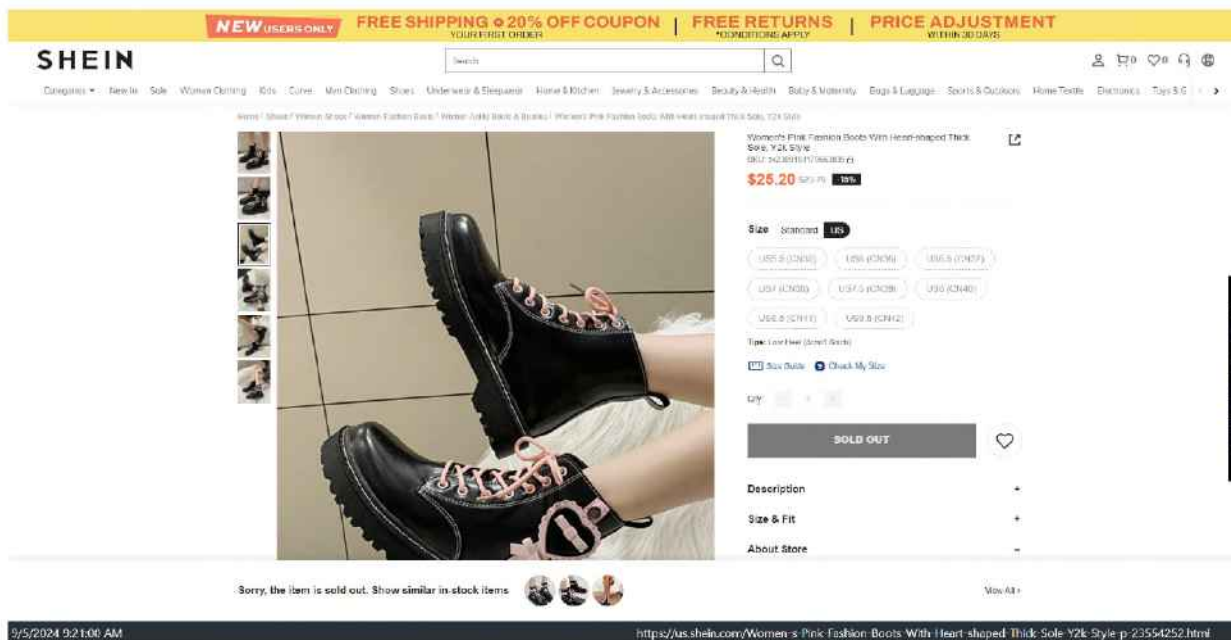
GET EXTRA 20% ▴

34



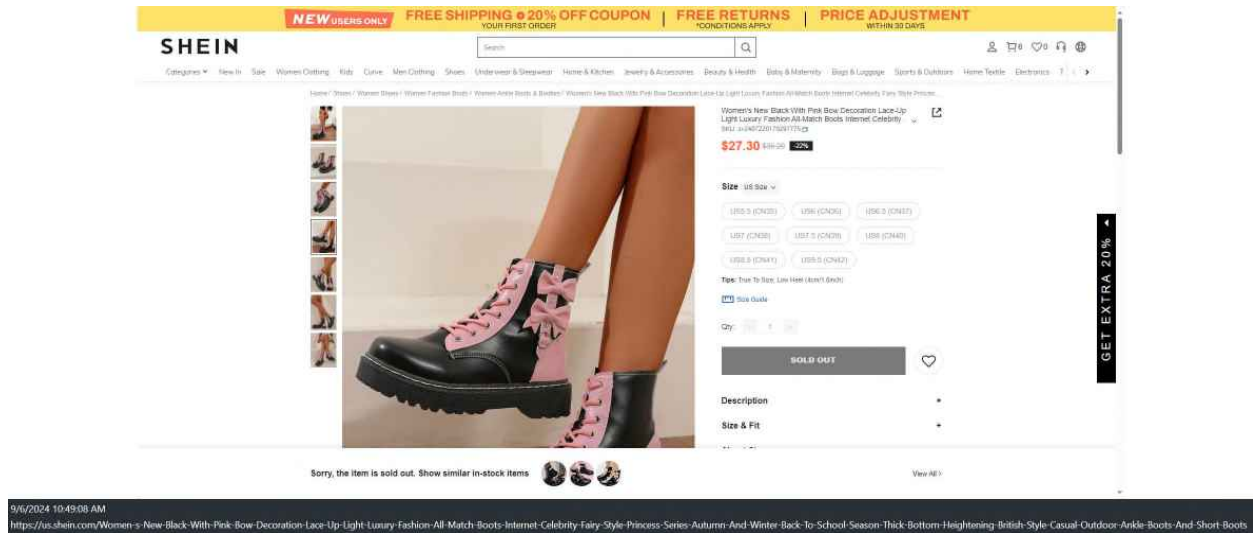


**Women's Pink Fashion Boots with Heart-shaped thick sole Y2k style -  
sx2309151179663835**



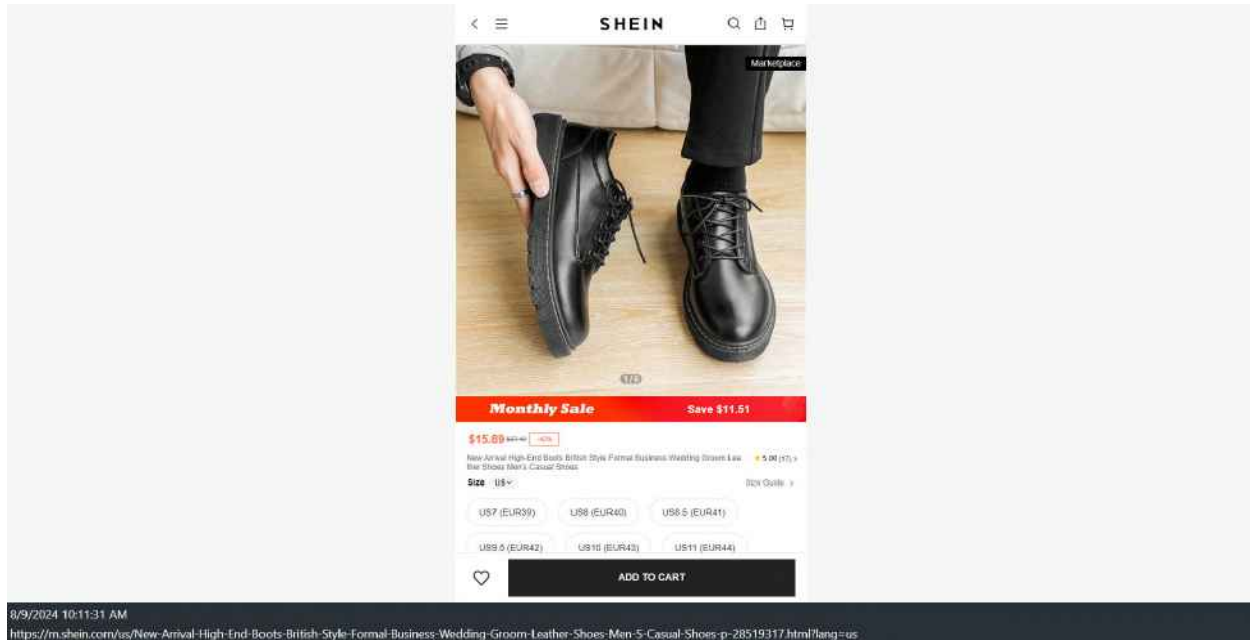


**Women's New Black With Pink Bow Decoration Lace-Up Light Luxury Fashion All-Match Boots Internet Celebrity Fairy Style Princess Series - sx2407220170297775**





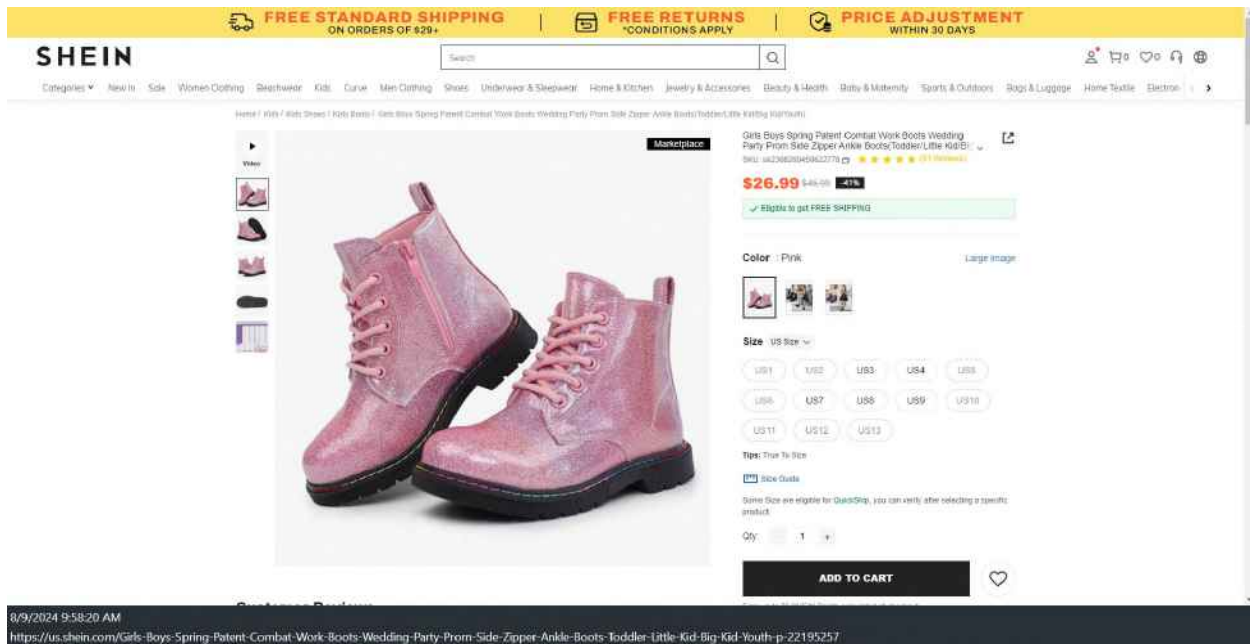
**New Arrival High-End Boots British Style Formal Business Wedding Groom  
Leather Shoes Men's Casual Shoes - sx231230605697661**







## Girls-Boys-Spring-Patent-Combat-Work-Boots-Wedding-Party-Prom Side-Zipper-Ankle-Boots - Sk2308260459622778







## Women's Fashionable Lucie Boot - sx2312272562731438

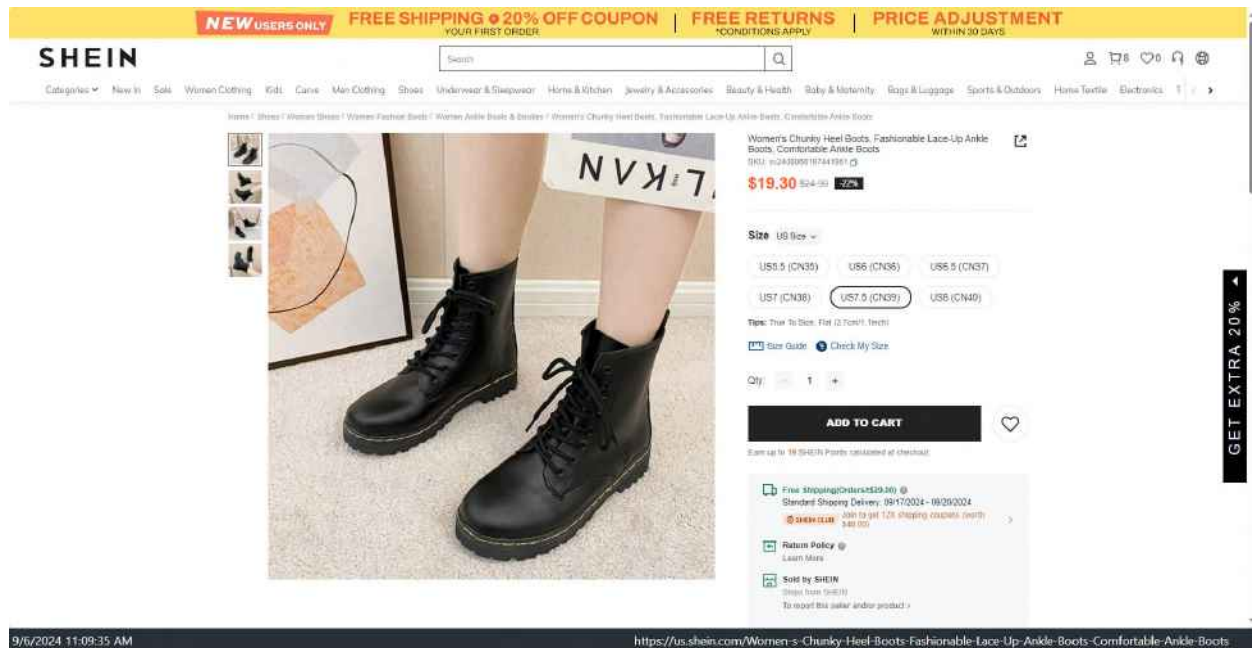


9/5/2024 10:50:44 AM  
[https://us.shein.com/Women's-Fashionable-Lucie-Boot-p-29260140.html?src\\_id=161363029660sc%3Dcombat%20boots%50sr%3D09660ps%3D18src\\_module=search&src\\_tab\\_page\\_id=page\\_select\\_class1711046435113&pageIdType=48](https://us.shein.com/Women's-Fashionable-Lucie-Boot-p-29260140.html?src_id=161363029660sc%3Dcombat%20boots%50sr%3D09660ps%3D18src_module=search&src_tab_page_id=page_select_class1711046435113&pageIdType=48)





**Women's Chunky Heel Boots, Fashionable Lace-Up Ankle Boots,  
Comfortable Ankle Boots - sx2408066197441961**

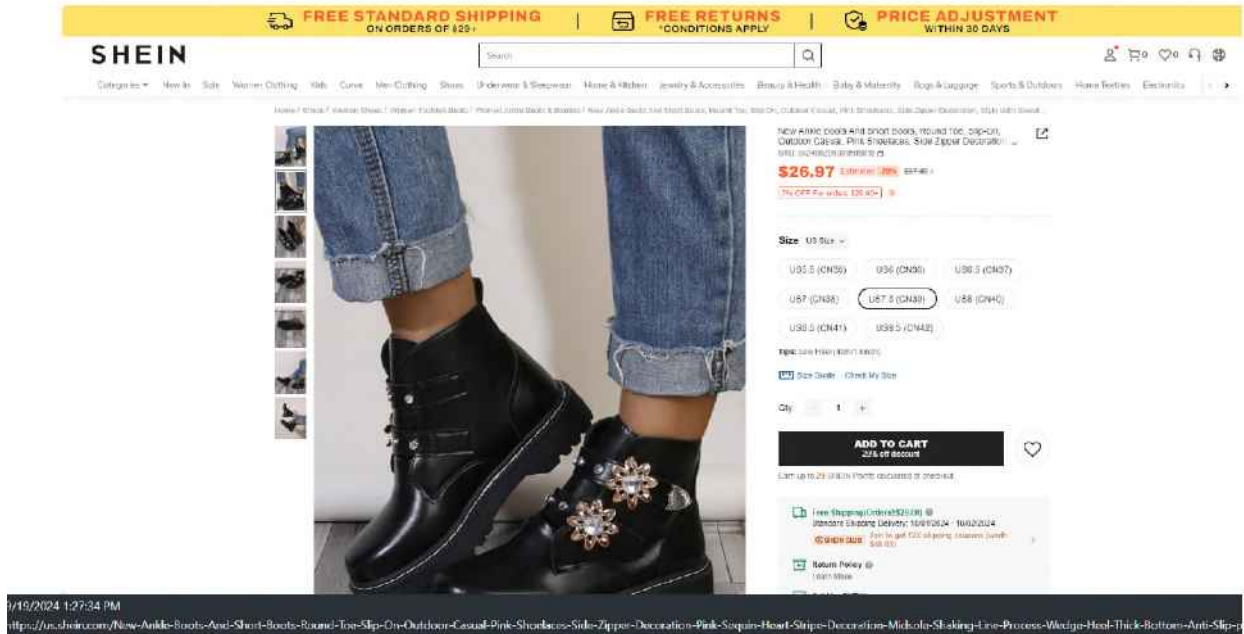








**New Ankle Boots And Short Boots, Round Toe, Slip-On, Outdoor Casual, Pink Shoelaces, Side Zipper Decoration, Style With Sweater, Pink Sequin Heart Stripe Decoration - sx2406295990508018**





**Women Fashion Ankle Boots, Casual Short Boots, Classic Mid-Calf Boots, Ladies Motorcycle Shoes, Mid-Calf Boots, Women Boots - sx2407065348844371**

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Home / Shoes / Women Shoes / Women Fashion Boots / Women Mid-Calf Boots / Women Fashion Ankle Boots, Casual Short Boots, Classic Mid-Calf Boots, Ladies Motorcycle Shoes, Mid-Calf Boots, Women Boots

Marketplace

Women Fashion Ankle Boots, Casual Short Boots, Classic Mid-Calf Boots, Ladies Motorcycle Shoes, Mid-Calf Boots

SX2407065348844371

**\$27.70** ~~\$35.00~~ -22%

Size US Size

US6 (CN36) US6.5 (CN37) US7 (CN38)

US7.5 (CN39) US8 (CN40) US8.5 (CN41)

US9 (CN42) US10 (CN43)

Tip: True To Size

Size Guide

Qty: 1

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<https://us.shein.com/Women-Fashion-Ankle-Boots-Casual-Short-Boots-Classic-Mid-Calf-Boots-Ladies-Motorcycle-Shoes-Mid-Calf-Boots-Women-Boots>

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## Genuine Leather Boots For Women, 2023 New Collection, British Style, Spring\_Autumn Single Boots, Thin And Summer Short Boots Featuring Slim And Thick Bottom - Sx2310272571949819


11/9/23, 8:39 PM Genuine Leather Boots For Women, 2023 New Collection, British Style, Spring/autumn Single Boots, Thin And Summer Short Boots Featuring Slim And Thick Bottom | SHEIN USA

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Home / Shoes / Women Shoes / Women Fashion Boots / Women Ankle Boots & Booties / Genuine Leather Boots For Women, 2023 New Collection, British Style, Spring/autumn Single Boots, Thin And Summer Short Boots...




Marketplace

Genuine Leather Boots For Women, 2023 New Collection, British Style, Spring/autumn Single Boots, Thin And Summer Short Boots Featuring Slim And Thick Bottom  
SKU: sx2310272571949819

Price: **\$18.90** ~~\$22.40~~ -10%

Make 4 payments of \$4.72 **Now!**

Color: Black Large image




Size: US Size ▾

US5.5 (CN5) US6 (CN36) US6.5 (CN37) US7 (CN38) US7.5 (CN39)

US8 (CN40)

Tips: True To Size


 Size Guide

Qty: 1

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Express Shipping **\$12.90** FREE on orders \$129.00+  
Estimated to be delivered on 17/11/2023 - 19/11/2023.  
80.94% are ≤ 7 days

1/2 >

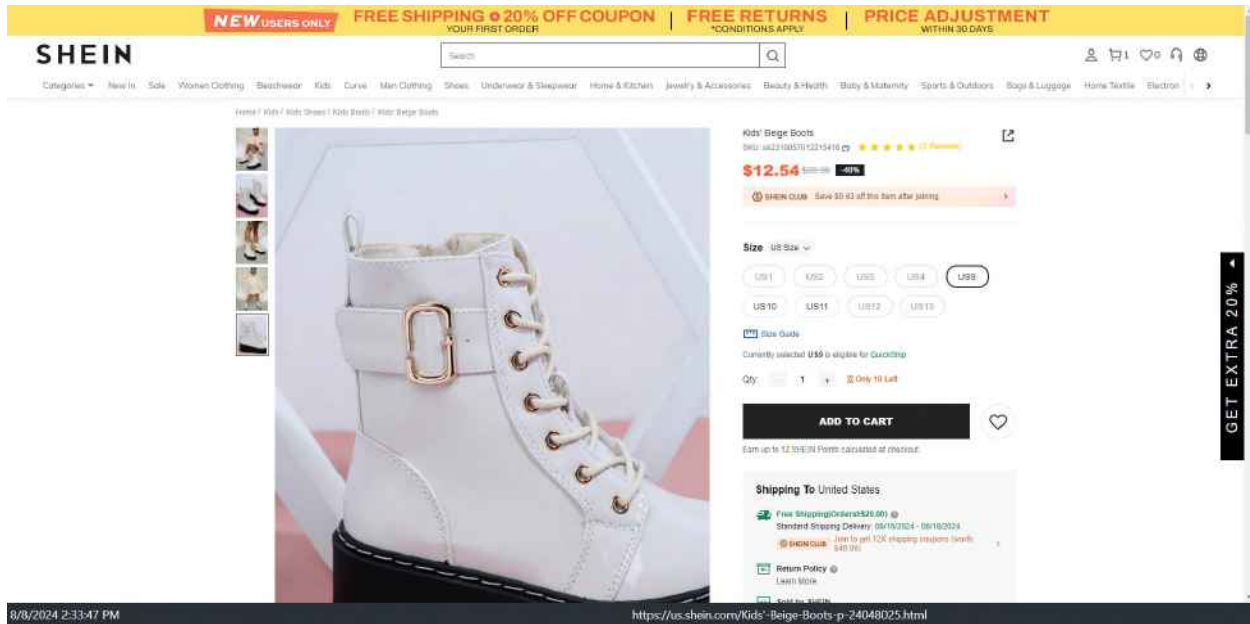
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<https://us.shein.com/Genuine-Leather-Boots-For-Women-2023-New-Collection-British-Style-Spring-autumn-Single-Boots-Thin-And-Summer-Short-Boots-Featuring-Slim-And-Thick-Bottom-p-25609623-...> 1/

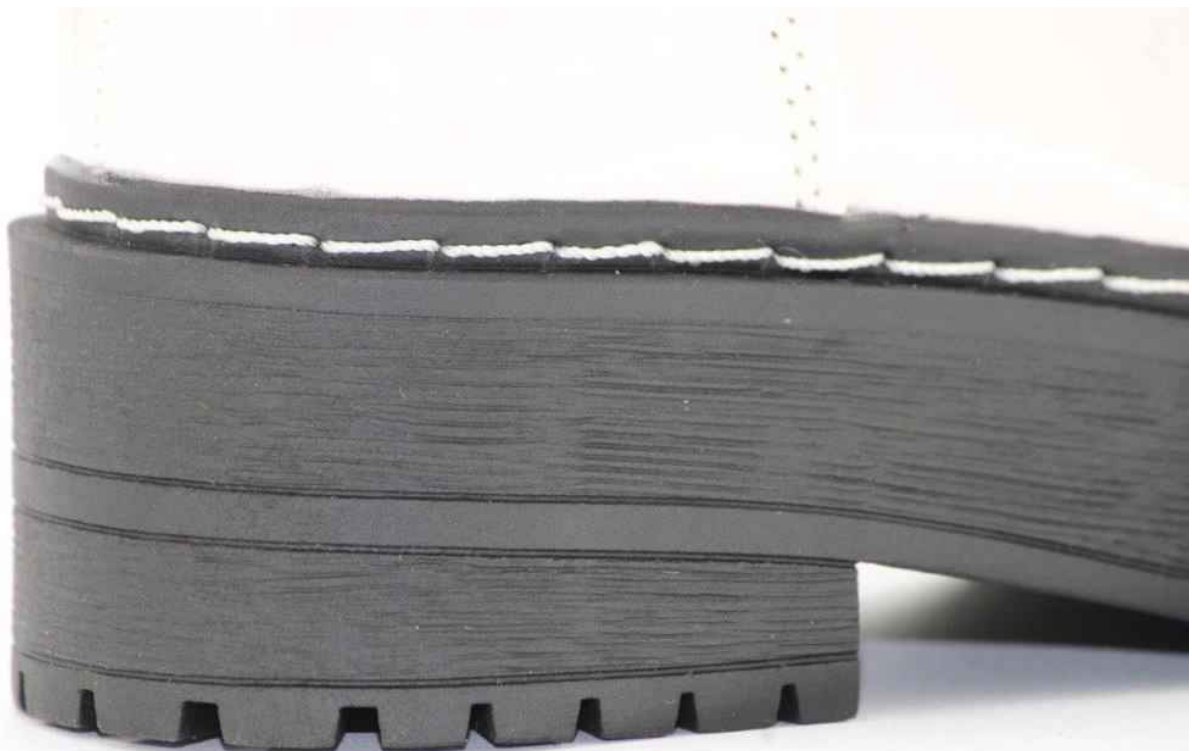




## Kids' Beige Boots - Sk2310057012215416







**Men's Thick Sole Anti-Slip Wear-Resistant Round Toe Stylish Spider Web Design Lace-Up Casual Leather Shoes, Retro Fashion And Versatile Business Formal Leather Boots - sx2407307720733312**

**SHEIN**

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Home / Shoes / Men Shoes / Dress Shoes / Men's Thick Sole Anti-Slip Wear-Resistant Round Toe Stylish Spider Web Design Lace-Up Casual Leather Shoes, Retro Fashion And Versatile Business Formal Leather Boots

**Men's Thick Sole Anti-Slip Wear-Resistant Round Toe Stylish Spider Web Design Lace-Up Casual Leather Shoes**

SKU: sx2407307720733312

**\$28.00** ~~\$39.00~~ -28%

7% OFF For orders \$29.00+

Color: White [Large Image](#)

Size: US Size ▾

US7 (EUR39) US8 (EUR40) US8.5 (EUR41)

US9.5 (EUR42) US10 (EUR43)

US11 (EUR44)

Tip: True to Size

[Size Guide](#) [Check My Size](#)

Qty: 1

**SOLD OUT**

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9/19/2024 11:34:24 AM

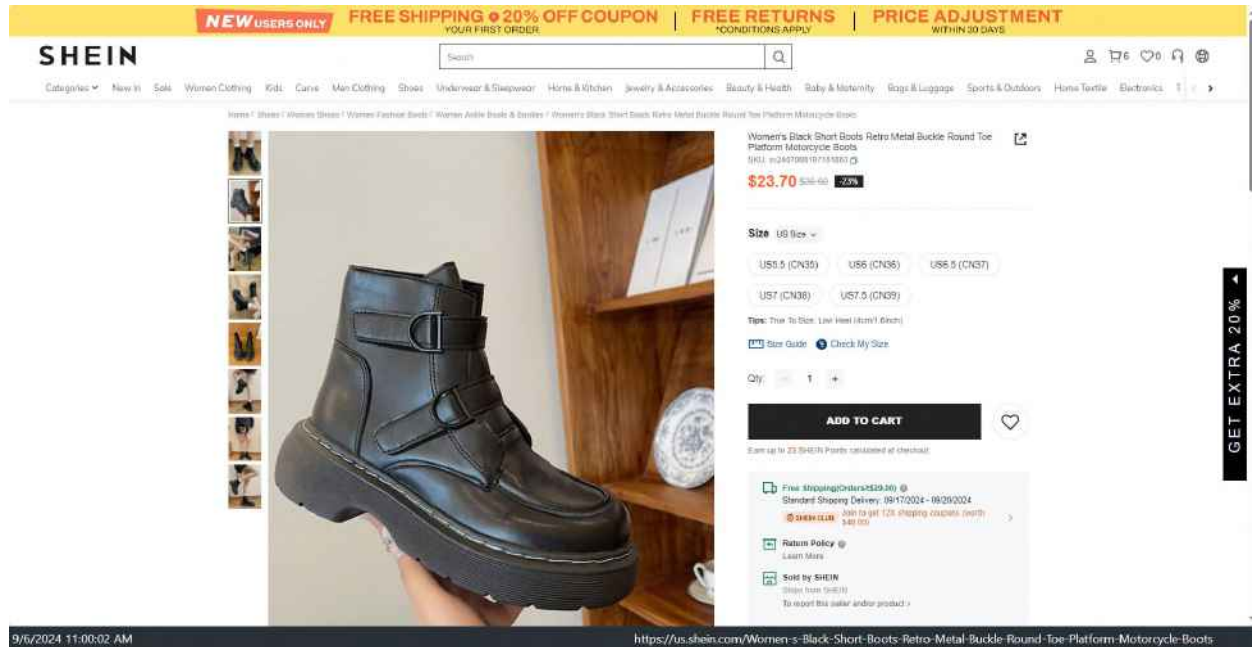
<https://us.shein.com/Men-Autumn-Boots-Men-Boots-High-Top-Shoes-British-Style-Work-Boots-Trendy-Shoes-Korean-Version-All-Match-Motorcycle-Leather-Boots-Winter-p-39308925>








**Women's Black Short Boots Retro Metal Buckle Round Toe  
Platform Motorcycle Boots - sx2407086197161863**









## 2024 New Thick Sole Boots White Short Ankle Boots For Women, Spring Autumn British Style - sx2112046827192298

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Categories: New In, Sale, Women Clothing, Kids, Curve, Men Clothing, Shoes, Underwear & Sleepwear, Home & Kitchen, Jewelry & Accessories, Beauty & Health, Bags & Motherly, Bags & Luggage, Sports & Outdoors, Home Textile, Electronics

Home / Shoes / Women Shoes / Women Fashion Boots / Women Ankle Boots & Sockies / 2024 New Thick Sole Boots White Short Ankle Boots For Women, Spring Autumn British Style

2024 New Thick Sole Boots White Short Ankle Boots For Women, Spring Autumn British Style  
SKU: sx2112046827192298 ★★★★★ (1589 Reviews)

**\$25.10** ~~\$32.00~~ 22%

Color: Black Large image

Size: US Size

US 5.5 (CN35) US 6 (CN36) US 6.5 (CN37)  
US 7 (CN38) US 7.5 (CN39) US 8 (CN40)  
US 8.5 (CN41) US 9 (CN42)

Type: True To Size: Low Heel (4.5cm-9cm)

[Size Guide](#) [Check My Size](#)

Qty: 1

**ADD TO CART**

Free Shipping (Orders \$29.00 @ Standard Shipping Delivery: 08-17-2024 - 08-20-2024)

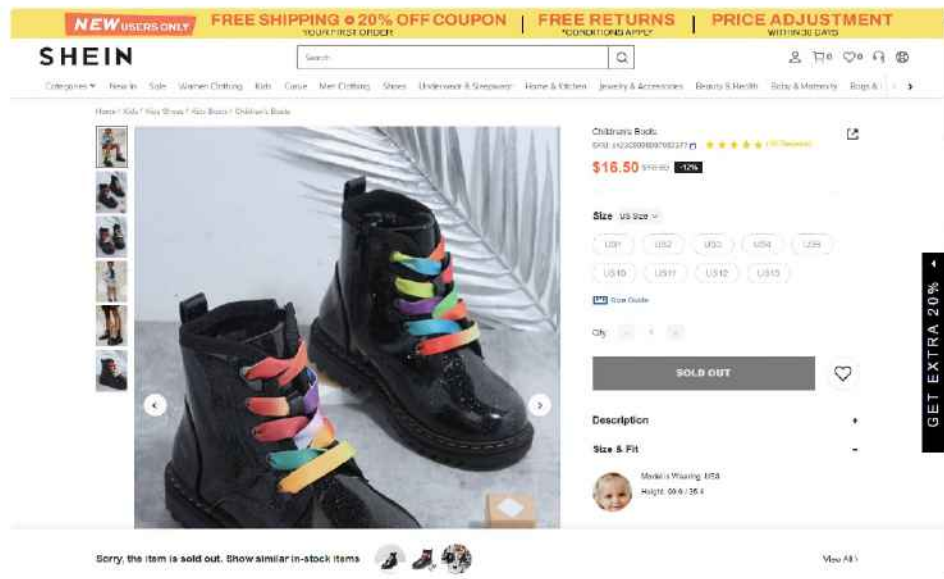
9/6/2024 10:24:31 AM  
<https://us.shein.com/2024-New-Thick-Sole-Boots-White-Short-Ankle-Boots-For-Women-Spring-Autumn-British-Style->

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## Children's Boots - sk2309099907087377



9/9/2024 9:43:53 AM  
[https://us.shein.com/Children-s-Boots-p-25225816.html?nc\\_id=identifier%3D%26%3Ddream%20paris%20girls%20boots%60hr%3D%60ps%3D16src\\_module=search&src\\_tab\\_page\\_id=page\\_search1711040159847&mailCode=16](https://us.shein.com/Children-s-Boots-p-25225816.html?nc_id=identifier%3D%26%3Ddream%20paris%20girls%20boots%60hr%3D%60ps%3D16src_module=search&src_tab_page_id=page_search1711040159847&mailCode=16)





## Women's New Black with Pink Box Decoration Lace-Up Light Luxury Ankle Boots - sx2407229706776390

**SHEIN** NEW USER ONLY **FREE SHIPPING & 20% OFF COUPON** YOUR FIRST ORDER **FREE RETURNS** \*CONDITIONS APPLY **PRICE ADJUSTMENT** WITHIN 90 DAYS

Categories: Home / Shoes / Women's Shoes / Women's Fashion Boots / Women's Ankle Boots & Booties / Women's New Black With Pink Box Decoration Lace-Up Light Luxury Fashion All-Match Boots Internet Celebrity Fairy Style Princess Series Autumn And Winter Back-To-School Season Thick Bottom Heightening Boots

**Women's New Black With Pink Box Decoration Lace-Up Light Luxury Fashion All-Match Boots Internet Celebrity Fairy Style Princess Series Autumn And Winter Back-To-School Season Thick Bottom Heightening Boots**

**\$26.60** ~~\$34.00~~ **-22%**

**Size** US Size US Size

US6.5 (CN35) US6 (CN36) US6.5 (CN37)  
US7 (CN38) US7.5 (CN39) US8 (CN40)  
US8.5 (CN41) US9 (CN42)

Tip: You can select Low Height (Short) or High Height (Tall) for the boots.

**ADD TO CART**

Color: 01 (Black) 02 (Pink) 03 (Black & Pink) 04 (Black & White)

**Free Shipping** (Promo: S24.00) @  
Standard Shipping (Country: 19042024-10/20/2024)  
**\$3.00** Get to get (20% coupon & coupon code)

**REVIEW** (100%) @  
1 review (100%)

**Sold by** SHEIN  
Shoes from 30/09/24

9/23/2024 10:53:33 AM  
<https://us.shein.com/us/Women-s-New-Black-With-Pink-Box-Decoration-Lace-Up-Light-Luxury-Fashion-All-Match-Boots-Internet-Celebrity-Fairy-Style-Princess-Series-Autumn-And-Winter-Back-To-School-Season-Thick-Bottom-Heightening-Bo>





## Men's Low-Cut Lace Up Leather Loafers with Round Toe, Suitable For Business, Office, Formal Wear - Sx2401196755872864

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Home / Shoes / Men Shoes / Men Loafers / Men's Low-Cut Lace-Up Leather Loafers With Round Toe, Suitable For Business, Office, Formal Wear And Casual Wear, Breathable Anti-Skid And Fashionable

**Marketplace**

Men's Low-Cut Lace-Up Leather Loafers With Round Toe, Suitable For Business, Office, Formal Wear And Casual Wear - Sx2401196755872864

**\$18.60** ~~\$26.50~~ -28%

Size US Size US7 (CN39) US7.5 (CN40) US8 (CN41) US8.5 (CN42) US9 (CN43) US10 (CN44)

[Size Guide](#) [Check My Size](#)

Qty:  Only 1 Left

**ADD TO CART**

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**Shipping To United States**

[Free Shipping](#) (Orders \$29.00) @ Standard Shipping Delivery: Aug 19 - Aug 22

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<https://us.shein.com/Men-s-Low-Cut-Lace-Up-Leather-Loafers-With-Round-Toe-Suitable-For-Business-Office-Formal-Wear-And-Casual-Wear-Breathable-Anti-Skid-And-Fashionable-p-29948153-cat-2090.html>






Faux Leather Lace Up Sole Combat Boots - Sx2308186040979785

11/9/23, 8:38 PM

Faux Leather Lace Up Lug Sole Combat Boots | SHEIN USA

Home / Shoes / Women Shoes / Women Fashion Boots / Women Ankle Boots & Booties / Faux Leather Lace Up Lug Sole Combat Boots



Color: Black

Size US Size

US 5.5 US 6 US 6.5 US 7 US 7.5 US 8 US 8.5 US 9 US 10

Tip: Mid Heel (8cm/2.4inch)

Size Guide

Qty: 1

ADD TO CART

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Shipping To United States

Faux Leather Lace Up Lug Sole Combat Boots

SKU: sx2308186040979785

(2 Reviews)

\$35.20

Make 4 payments of \$8.80

Color: Black

Size US Size

US 5.5 US 6 US 6.5 US 7 US 7.5 US 8 US 8.5 US 9 US 10

Tip: Mid Heel (8cm/2.4inch)

Size Guide

Qty: 1

ADD TO CART

Earn up to 35 SHEIN Points calculated at checkout.

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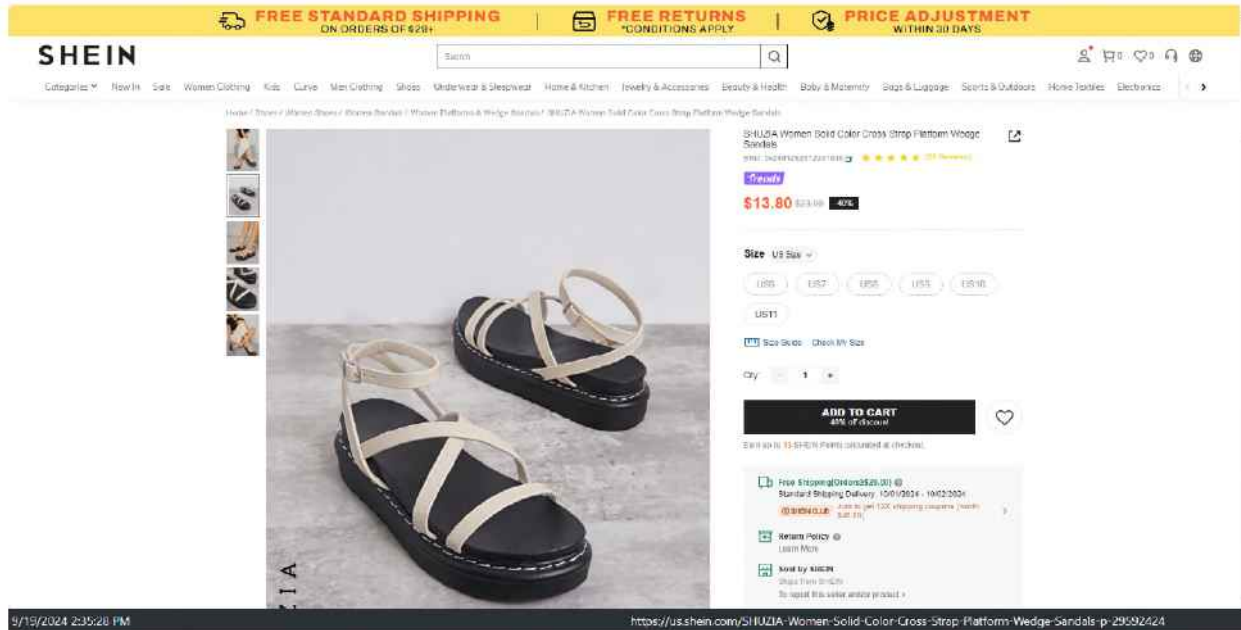
Categories New In Sale Women Clothing Curve Kids Men Fashion Women Lingerie & Sleep Women Jewelry & Accessories Women Shoes Home & Kitchen Sports & Outdoors Baby & Ma

https://us.shein.com/Faux-Leather-Lace-Up-Lug-Sole-Combat-Boots-p-23779770-cat-1748.html?src\_id=fc%3DWomen Shoes%60sc%3DWomenShoes%60tc%3DBoots%60oc%3DFashionBoot...

82

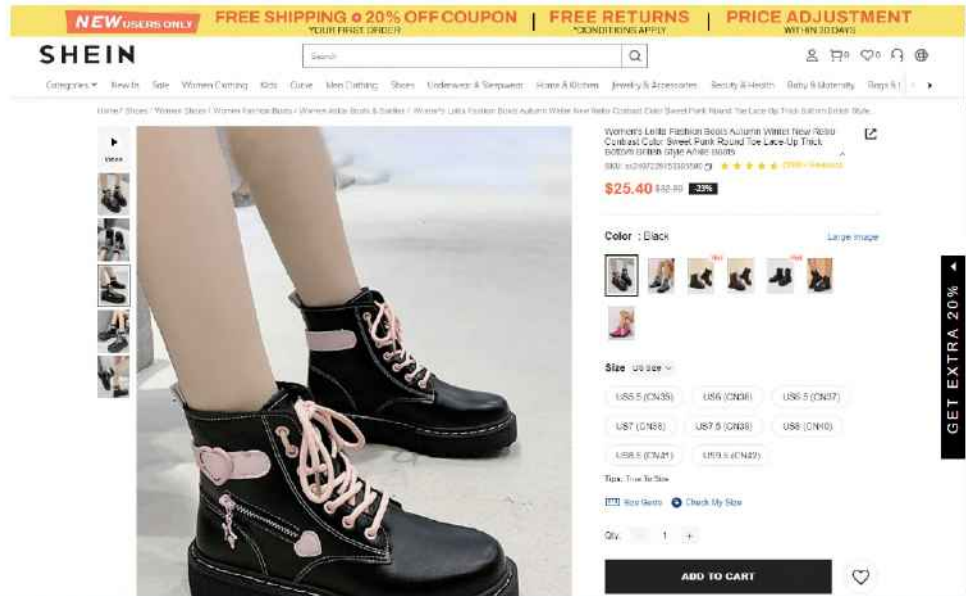


## SHUZIA Women Solid Color Cross Strap Platform Wedge Sandals - sx2401252312031838





# **Women's Lolita Fashion Boots Autumn Winter New Retro Contrast Color Sweet Punk Round Toe Lace-Up Thick Bottom British Ankle Boots - sx2407225153385500**



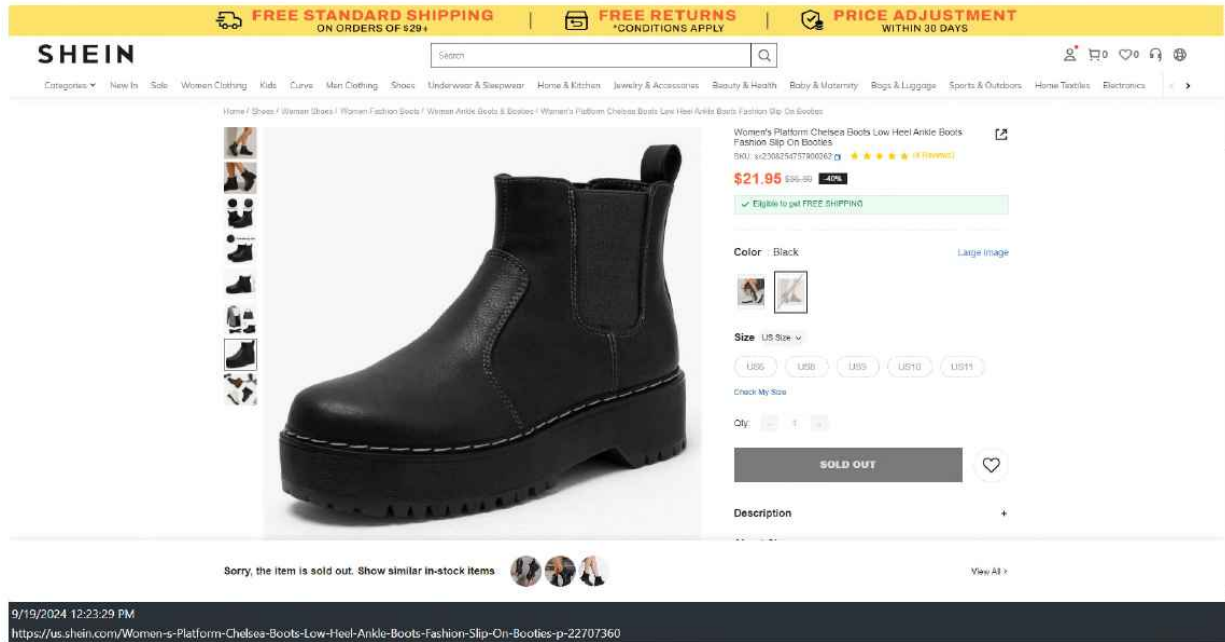
1/5/2024 9:35:46 AM

[http://us.shein.com/Women-s-Lolita-Fashion-Boots-Autumn-Winter-New-Retro-Contrast-Color-Sweet-Punk-Round-Toe-Lace-Up-Thick-Bottom-British-Style-Ankle-Boots-p-39248413.html?imgRatio=8&ref=www&reg=de&ret=us&main\\_atb=2](http://us.shein.com/Women-s-Lolita-Fashion-Boots-Autumn-Winter-New-Retro-Contrast-Color-Sweet-Punk-Round-Toe-Lace-Up-Thick-Bottom-British-Style-Ankle-Boots-p-39248413.html?imgRatio=8&ref=www&reg=de&ret=us&main_atb=2)

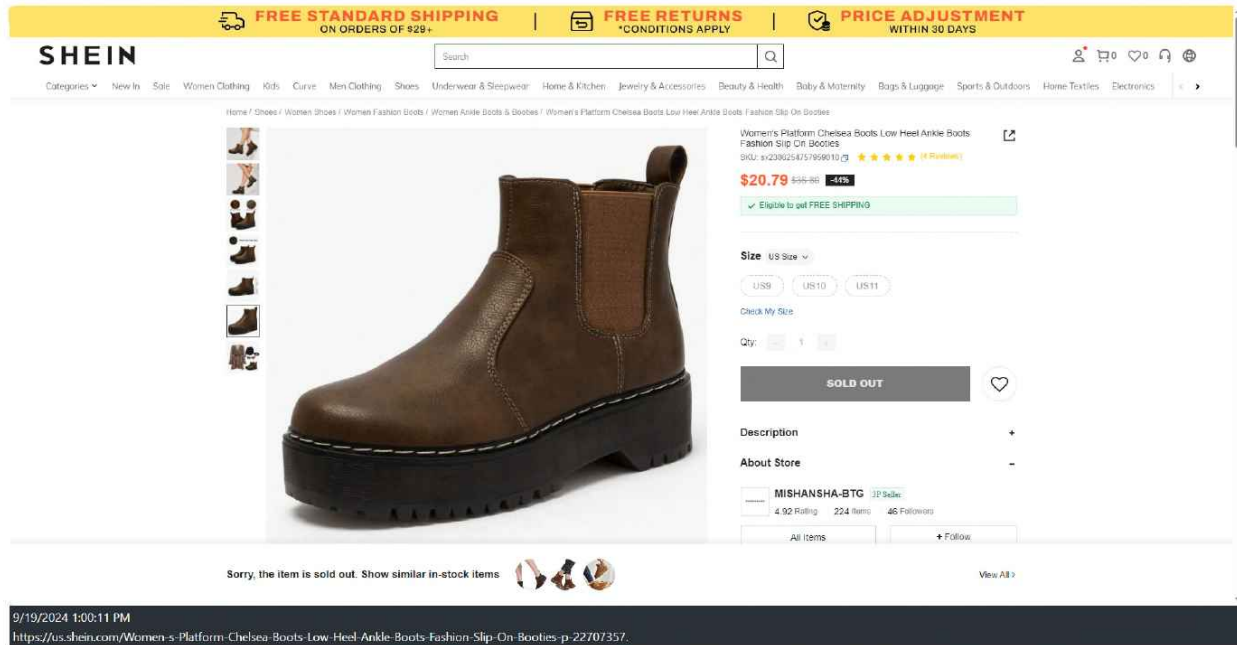




## Women's Platform Chelsea Boots Low Heel Ankle Boots Fashion Slip On Booties - sx2308254757900262




## Women's Platform Chelsea Boots Low Heel Ankle Boots Fashion Slip On Booties - sx2308254757959010





2024 New Thick Sole Boots White Short Ankle Boots For Women,  
Spring Autumn British Style - sx2112046827197660



2024 New Platform Boots For Women, Spring Autumn  
Chunky White Chelsea Ankle Boots

SKU: [sx2112046827197660](#) (1900+ Reviews)

**\$25.10** ~~\$32.40~~ -23%

Color: Black [Large image](#)

Size: US Size

US5 5 (CN35) US6 (CN36) US6.5 (CN37)  
US7 (CN38) **US7.5 (CN39)** US8 (CN40)  
US8.5 (CN41) US9 5 (CN42)

Tips: True To Size, Low Heel (4.5cm/1.8inch)

[Size Guide](#) [Check My Size](#)

Qty: 1

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## Women's Fashionable Motorcycle Boots, British Style, Autumn New Style, Niche Street Explosion, Thick Heel Short Boots In Pink - Sx2309185495646637

11/9/23, 8:38 PM

Women's Fashionable Motorcycle Boots, British Style, Autumn New Style, Niche Street Explosion, Thick Heel Short Boots In Pink | SHEIN USA


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[Sports & Outdoors](#)
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[Home](#) / [Shoes](#) / [Women Shoes](#) / [Women Fashion Boots](#) / [Women Ankle Boots & Booties](#) / [Women's Fashionable Motorcycle Boots, British Style, Autumn New Style, Niche Street Explosion, Thick Heel Short Boots In Pink](#)



Women's Fashionable Motorcycle Boots, British Style, Autumn New Style, Niche Street Explosion, Thick Heel Short Boots In Pink

SKU: sx2309185495646637 ★★★★★ (2 Reviews)

**\$18.25** ~~\$26.56~~ -31%

Make 4 payments of \$4.56 [View](#)

---

**Size** US Size ▾

US5.5 (CN35)
US6 (CN36)
US6.5 (CN37)
US7 (CN38)
US7.5 (CN39)

US8 (CN40)

Tip: Low Heel (3.6cm/1.4inch)

[📏 Size Guide](#)

Qty: 1 Only 8 Left

ADD TO CART

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**Shipping To United States**

**Delivery**

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77.13% are ≤ 18 days

Express Shipping \$12.00, FREE on orders \$129.00+

Estimated to be delivered on 17/11/2023 - 19/11/2023

80.94% are ≤ 7 days

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## Shuzia Women's Black PU Iconic Replica Platform Boots - Sx2308184467358951

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Home / Shoes / Women Shoes / Women Fashion Boots / Women Ankle Boots & Booties / SHUZIA Women's Black Pu Iconic Replica Stitching Sole Platform Combat Boots-Lace-Up With Side Zipper, Comfortable, Durable, ...



SHUZIA Women's Black Pu Iconic Replica Stitching Sole Platform Combat Boots-Lace-Up With Side Zipper, ...  
SKU: Sx2308184467358951 ★★★★★ (190+ Reviews)

**Trends**  
**\$24.75** ~~\$33.00~~ -29%

**Size** US Size US 5 US 6 US 6.5 US 7 US 7.5 US 8 US 8.5 US 9 US 10

**Tip:** Mid Heel (5cm/2.4inch)

[Size Guide](#) [Check My Size](#)

Qty:

**ADD TO CART**

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Ships from SHEIN

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<https://us.shein.com/Faux-Leather-Lace-Up-Lug-Sole-Combat-Boots-p-23779791.html?mallCode=1&pageListType=4>





## European & American Women Summer Flat Sandals - Sx2403022142424209

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Categories ▾ New In Sale Women Clothing Beachwear Kids Curve Men Clothing Shoes Underwear & Sleepwear Home & Kitchen Jewelry & Accessories Beauty & Health Baby & Maternity Sports & Outdoors Bags & Luggage Home Textile Electron >

Home / Shoes / Women Shoes / Women Sandals / Women Platforms & Wedge Sandals / European & American Women Summer Flat Sandals, Open Toe Thick Sole Anti-Slip Multistrip Gold-Tone Buckle Straps Design Punk...

**Marketplace**

European & American Women Summer Flat Sandals, Open Toe Thick Sole Anti-Slip Multistrip Gold-Tone Buckle Straps Design Punk...  
SKU: sx2403022142424209 ★ ★ ★ ★ ★ (27 Reviews)

**\$15.60** ~~\$20.20~~ -23%  
7% OFF For orders \$29.00+

**Size** US Size ▾

US6 (CN36) US6.5 (CN37) US7 (CN38)  
US7.5 (CN39) US8 (CN40) US8.5 (CN41)  
US9.5 (CN42) US10 (CN43)

**Tips:** Half Size Smaller  
[Size Guide](#) [Check My Size](#)

Qty: 1 +

**ADD TO CART**

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<https://us.shein.com/European-8-American-Women-Summer-Flat-Sandals-Open-Toe-Thick-Sole-Anti-Slip-Multistrip-Gold-Tone-Buckle-Straps-Design-Punk-Style-Shoes-For-Daily-Wear-Outdoor-Activities-Music-Festivals-Beach-Parties>












## Men Autumn Boots Men Boots High Top Shoes British Style Work Boots Trendy Shoes Korean Version All Match - sx2407155475256533

**NEW USERS ONLY** **FREE SHIPPING** **20% OFF COUPON** **FREE RETURNS** **PRICE ADJUSTMENT**

**SHEIN**      


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Home / Shoes / Men Shoes / Men Boots / Men High Top Leather Riding Boots / Men Autumn Boots Men Boots High Top Shoes British Style Work Boots Trendy Shoes Korean Version All Match Motorcycle Leather Boots W...

**Men Autumn Boots Men Boots High Top Shoes British Style Work Boots Trendy Shoes Korean Version All Match**  
SKU: sx2407155475256533


**\$30.10** ~~\$49.99~~ **-39%**



✓ Eligible to get FREE SHIPPING


**Size** **US Size** 

US7 (CN39) US7.5 (CN40) US8 (CN41)




**US8.5 (CN42)** US9 (CN43) US10 (CN44)



 [Size Guide](#)


Qty:    **Only 1 Left**

**ADD TO CART** **Only 1 Left** 

Earn up to \$2 SHEIN Points calculated at checkout

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Ships from 09/28  
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<https://us.shein.com/Men-Autumn-Boots-Men-Boots-High-Top-Shoes-British-Style-Work-Boots-Trendy-Shoes-Korean-Version-All-Match-Motorcycle-Leather-Boots-Winter-p-39308925>








## SHUZIA Ladies White Trendy Platform New 2024 Combat Fashion Booties Shoe's - Sx2406195517632924

**SHEIN** NEW USERS ONLY **FREE SHIPPING + 30% OFF COUPON** YOUR FIRST ORDER **FREE RETURNS** NO CONDITIONS APPLY **PRICE ADJUSTMENT** WITHIN 30 DAYS

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Home / Shoes / Women Shoes / Women Fashion Boots / Women Ankle Boots & Booties / SHUZIA Ladies White Trendy Platform New 2024 Combat Fashion Booties Shoe's



SHUZIA Ladies White Trendy Platform New 2024 Combat Fashion Booties Shoe's  
SKU: SX2406195517632924

**Trends**  
**\$29.60** ~~\$39.00~~ **-20%**

✓ Eligible to get FREE SHIPPING

Color: White [Large image](#)

Size: US Size

US6 US7 US8 US9 US10  
US11

Mid Heel (5cm/2inch)

[Size Guide](#) [Check My Size](#)

Qty:

**ADD TO CART**  
20% off discount

Earn up to 20 SHEIN Points calculable at checkout.

**GET EXTRA 30%**

10/16/2024 4:09:42 PM <https://us.shein.com/SHUZIA-Ladies-White-Trendy-Platform-New-2024-Combat-Fashion-Booties-Shoe>





# **Exhibit 4**

Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes  
with Lace Up - baby pink  
(sx2211177712705066)

NEW USERS ONLY

FREE SHIPPING + 30% OFF COUPON

YOUR FIRST ORDER

FREE RETURNS

\*CONDITIONS APPLY

PRICE ADJUSTMENT

WITHIN 30 DAYS

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Home / Kids / Kids Shoes / Kids Boots / Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes With Lace Up

Video

Marketplace

Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes With Lace Up

SKU: sx2211177712705066

★★★★★ (195+ Reviews)

\$21.80

~~\$49.60~~

-46%

10% OFF For orders \$29.00+

10% OFF For orders \$39.00+

Limit

✓ Eligible to get FREE SHIPPING

Color

Baby Pink

Large image

Size

US1

US2

US3

US4

US5

US6

US9

US10

US11

US12

US13

ADD TO CART

Lowest price in 90 days

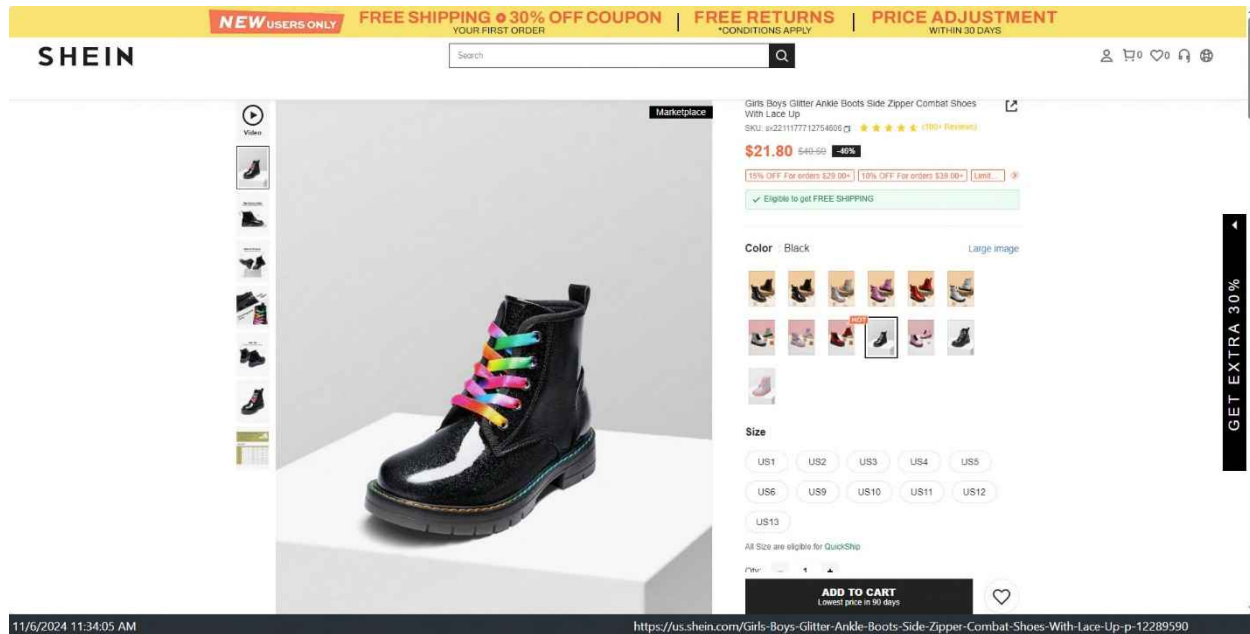
11/6/2024 12:03:16 PM

https://us.shein.com/Girls-Boys-Glitter-Ankle-Boots-Side-Zipper-Combat-Shoes-With-Lace-Up-p-42299873

GET EXTRA 30%



# Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up - black (sx2211177712754606)





# Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up - multicolor (sx2211177712788167)

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Video

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Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes With Lace Up

SKU: sx2211177712788167


★★★★★ (100+ Reviews)

From **\$21.80** ~~\$40.69~~ -40%

10% OFF For orders \$20.00+ | 10% OFF For orders \$30.00+ | Limit 1

✓ Eligible to get FREE SHIPPING

Color: Multicolor [Large image](#)



Size

US1

US2

US3

US4

US5

US6

US9

US10

US11

US12

US13

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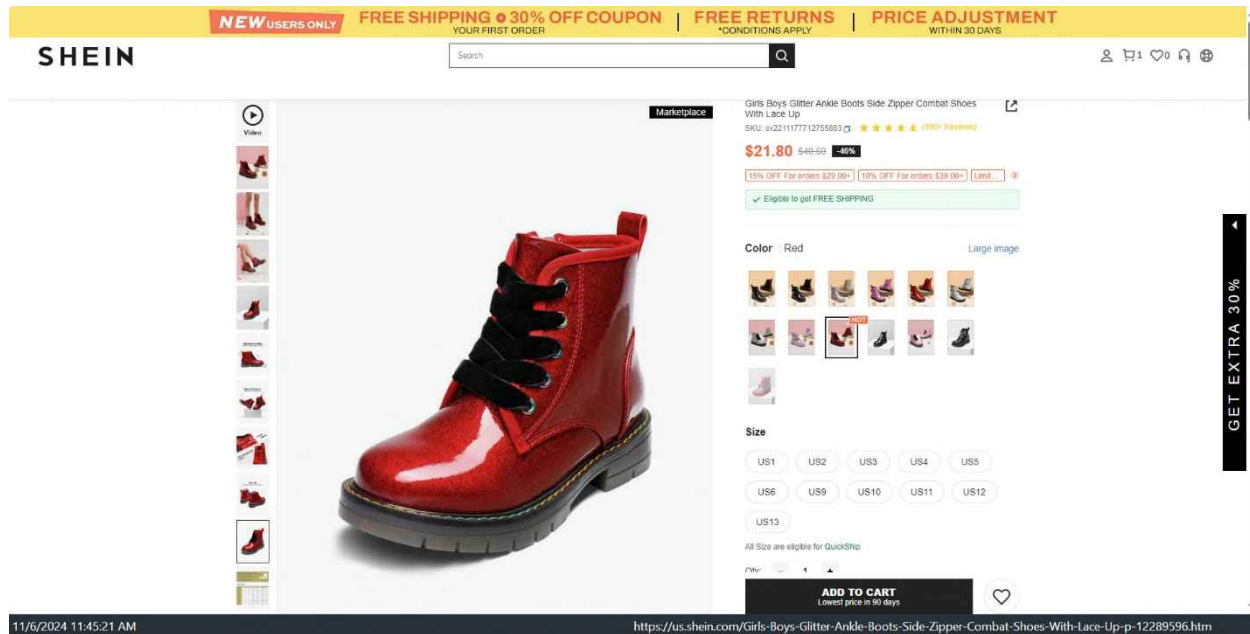
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# Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up - red (sx2211177712755883)





# Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes with Lace Up - silver (sx2211177712721002)

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Marketplace



Girls Boys Glitter Ankle Boots Side Zipper Combat Shoes With Lace Up

SKU: sx2211177712721002

\$21.80

\$49.60

-46%

10% OFF For orders \$29.00+


10% OFF For orders \$39.00+

Limit 1

Eligible to get FREE SHIPPING

Color Silver

Large image



Size

US1

US2

US3

US4

US5

US6

US9

US10

US11

US12

US13

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## Kids Girls Glitter Ankle Boots Lace Up Waterproof Combat Boots With Side Zipper (Toddler) – pink (sk2305236190947306)

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**Marketplace**

Kids Girls Glitter Ankle Boots Lace Up Waterproof Combat Boots With Side Zipper (Toddler)  
SKU: sk2305236190947306 ⭐⭐⭐⭐⭐ (35 Reviews)

**\$19.99** ~~\$49.99~~ -60%

Make 4 payments of \$4.99 **Interest**

✓ Eligible to get FREE SHIPPING

**Color** : Pink [Large image](#)

**Size** US Size ▾

6 Toddler 7 Toddler 8 Toddler 9 Toddler  
9.5 Toddler 10 Toddler

**True To Size**  
Some Size are eligible for **QuickShip**, you can verify after selecting a specific product

Qty: - 1 +

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## SHUZIA Women's Stitching Platform Combat Boots—Lace-Up With Side Zipper, Trendy Essential (sx2408292341193182)

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Home / Shoes / Women Shoes / Women Fashion Boots / Women Ankle Boots & Booties / SHUZIA Women's Stitching Platform Combat Boots—Lace-Up With Side Zipper, Trendy Essential

**SHUZIA Women's Stitching Platform Combat Boots—Lace-Up With Side Zipper, Trendy Essential**  
SKU: sx2408292341193182 ★★★★★ (1380+ Reviews)

**\$26.95** ~~\$46.00~~ -29%  
Make 4 payments of \$6.73 **Here**

**Color** : White [Large image](#)

**Size** US Size ▾

US5.5 US6 US6.5 US7 US7.5  
US8 US8.5 US9 **US10**

Mid Heel (5.5cm/2.2inch)  
[Size Guide](#) [Check My Size](#)

Qty: 1 +

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A black, high-gloss, lace-up boot with a thick, textured sole, resembling a combat or punk style boot. The boot is shown from a side profile, highlighting its shiny finish and sturdy construction.

# Olivia Miller Girls Toddler Space Case Combat Boots – silver (sk2406196700247456)

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ON ORDERS OF \$9.9+


FREE RETURNS  
\*CONDITIONS APPLY

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Olivia Miller Girls Toddler Space Case Combat Boots

SKU: sk2406196700247456 (5)

**\$53.25** ~~\$71.00~~ -25%

✓ Eligible to get FREE SHIPPING

Color: Silver [Large image](#)



Size: US Size ▾

US5

US6

US7

US8

US9

**US10**

True To Size

Currently selected US10 is eligible for QuickShip

Qty: 1

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**Olivia Miller Girls Toddler Space Case Combat Boots – black (sk2406196700271510)**

FREE STANDARD SHIPPING  
ON ORDERS OF \$9.9+

FREE RETURNS  
\*CONDITIONS APPLY

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Marketplace

Olivia Miller Girls Toddler Space Case Combat Boots  
(SKU: sk2406196700271510) (1)

\$53.25

\$71.00

25%

✓ Eligible to get FREE SHIPPING

Color

Black

Large image

Size

US Size

US5

US6

US7

US8

US9

US10

True To Size

All Size are eligible for QuickShip

Qty:

-

1

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# Olivia Miller Girls Toddler Space Case Combat Boots – pink (sk2406196700219155)

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ON ORDERS OF \$9.9+

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\*CONDITIONS APPLY

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Olivia Miller Girls Toddler Space Case Combat Boots  
SKU: sk2406196700219155 gj

**\$53.25** ~~\$71.00~~ -25%

✓ Eligible to get FREE SHIPPING

Color : Pink [Large image](#)

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👢

Size US Size ▾

US5

US6

US7

US8

US9

US10

True To Size  
All Size are eligible for QuickShip

Qty: - 1 +

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25% off discount

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